

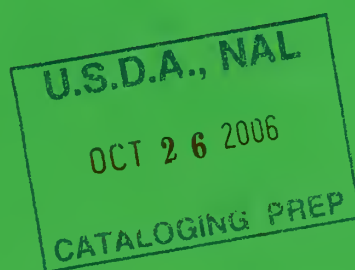
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Food Stamp Nutrition Education Systems Review

Final Report



United States
Department of
Agriculture

Food and
Nutrition
Service

September 2006

**United States
Department of
Agriculture**



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KEY WORD DEFINITIONS FOR THE FOOD STAMP NUTRITION EDUCATION SYSTEMS REVIEW

APPLICANTS:

Persons who have applied to the Food Stamp Program (FSP).

DIRECT EDUCATION:

Nutrition education interventions where participants are actively engaged in the learning process, either with an educator or through interactive media, such as kiosks or interactive web sites. The most common form of direct education is classroom lessons provided to FSNE participants.

EFNEP:

USDA's Expanded Food and Nutrition Education Program, designed to provide nutrition education to low-income youth and families with young children through Cooperative Extension Services operated by State land-grant universities.

ELIGIBLES:

Persons who are income-eligible for the Food Stamp Program, generally with household incomes under 130 percent of the Federal poverty guideline. Eligibles may or may not be food stamp recipients.

ELIGIBLE FOR FEDERAL REIMBURSEMENT:

Outlays for approved FSNE activities that meet the Federal requirements for allowable costs, as specified in regulations and program guidance are eligible.

FOR-PROFIT:

Organization or company established or operated with the intention of making a profit.

FORMATIVE RESEARCH:

Research used to ensure that messages, strategies, and materials used in the provision of FSNE services are understandable, relevant, credible, and acceptable to the target audience.

FTEs (FULL TIME EQUIVALENTS):

FTE is a measure of staff-work-year effort. One FTE is equivalent to 2,080 hours of work which could reflect, for example, one employee on a full-time schedule of 40 hours per week each year, or two part-time employees for 20 hours per week each year. An employee working 30 hours per week for a year is counted as .75 FTE. FTEs are not employee head counts.

FSNE:

Food Stamp Nutrition Education.

IMPLEMENTING AGENCY (IA):

An organization that has a contract or agreement with the State food stamp agency to deliver food stamp nutrition education. The IA is the primary unit of FSNE program planning, operations, and financial management. In FSNE Plan Guidance, implementing agencies are also known as "sub-grantees" since the primary grantee is the State food stamp agency.

INDIAN TRIBAL ORGANIZATION (ITO):

A recognized governing body of an Indian tribe on a reservation, or a recognized intertribal organization acting on behalf of two or more Indian tribes on a reservation. An ITO may serve as an implementing agency, subcontractor, or partner for FSNE.

INDIRECT EDUCATION:

Distribution of information and resources that are primarily designed to increase public awareness of FSNE and/or that reflect FSNE Plan Guidance for key FSNE core elements. Indirect education includes any mass communications, public events, or materials distribution that are not part of social marketing or direct education efforts.

IN-KIND CONTRIBUTION:

A non-cash donation or contribution of goods or services by an organization or individual. Examples include volunteer services, loaned staff, donated supplies or equipment, or free use of space. Use of an in-kind contribution by a public agency for approved FSNE activities is a reimbursable outlay. A shared resource is not considered an in-kind contribution to the FSP if it is funded through another Federal program.

LOCAL PROJECTS:

Most implementing agencies divide their operations into local projects, which are local subdivision of the implementing agency, such as a local Cooperative Extension office. In FSNE Plan Guidance, local projects and subcontractors that are operated under agreement with the implementing agencies are known as sub-sub-grantees.

LOW-INCOME PERSONS:

Persons with household incomes at or below 185 percent of the Federal poverty guideline, including persons participating in the Food Stamp Program.

NEEDS ASSESSMENT:

The process of identifying and describing the extent and type of nutrition education needs of individuals and/or target populations, and the methods to best address those needs.

NUTRITION NETWORK:

A consortium of agencies providing or involved in FSNE activities. The network may include representatives from government agencies, universities, nonprofit organizations, and private industry. The purpose of the nutrition network is to coordinate the delivery of FSNE with other nutrition education activities being conducted in the State. The nutrition network activities may include delivery of FSNE through social marketing techniques, coordination of FSNE activities with other public and private agencies, and conducting formative research to better integrate FSNE activities among multiple agencies.

NON-PROFIT:

An organization or company established for charitable, educational, or humanitarian purposes and not for making a profit. Holds a 501(c) 3 charitable status.

NON-REIMBURSABLE:

An outlay or expenditure is non-reimbursable if it does not qualify for Food and Nutrition Service reimbursement (matching funds) under FSP rules.

OUTCOME EVALUATION:

Research that assesses the impact of FSNE services on changes in client behavior, system operations, or other performance measures.

PARAPROFESSIONAL:

A trained worker who is not a professional nutritionist or dietician but is qualified to provide nutrition education under the supervision of a nutrition education professional.

PRIVATE CASH DONATIONS:

A donation of cash by a private organization or individual. FSNE rules permit Federal reimbursement (matching funds) of private donations used for FSNE under an approved waiver.

PROCESS EVALUATION:

Research that involves documenting and analyzing the operations of the FSNE service delivery system. This includes tracking the number of materials distributed, number of clients reached, and investigations of service delivery processes, technologies used, and alternative delivery procedures.

PROGRAM PARTNER:

An agency or entity that enters into a partnership arrangement with an implementing agency, subcontractor, or a local project to inform, coordinate, and/or share FSNE activities.

RECIPIENTS:

Persons participating in the Food Stamp Program and receiving program benefits.

SFSA:

State food stamp agency.

SOCIAL MARKETING:

A disciplined, consumer-focused, research-based process to plan, develop, implement, and evaluate interventions, programs, and multiple channels of communications that are designed to influence the voluntary behavior of a large number of the target audience. A social marketing campaign must include the following three features:

- The campaign targets a specific segment of the food stamp recipient, low-income population.
- The campaign addresses the specific nutrition needs of the target audience, associated behaviors, and their perceptions about reasons for and against changing behavior.
- The campaign includes interacting with the target audience to determine whether the message, materials, and delivery channel(s) are understood and meaningful and, thus, have the potential to lead to behavior change.

SUBCONTRACTORS:

Independent organizations with which an implementing agency has a contract or formal agreement for the provision of FSNE services. In FSNE Plan Guidance, subcontractors and local projects that are operated under agreement with the implementing agencies are known as sub-sub-grantees.

TARGET AUDIENCE:

The specific population identified to receive food stamp nutrition education services. The target audience may consist of a specific group or subset of the entire food stamp population, for example based on race, ethnicity, age, gender, income, occupation, health status, behavior, or a combination of these or other factors.

EXECUTIVE SUMMARY

I. Introduction

The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA) provides nutrition assistance as a food security safety net for eligible low-income households and individuals. Through these food assistance programs, FNS has also provided significant funding to States and local programs to provide nutrition education designed to help program participants and potential participants to choose healthy foods and active lifestyles.

In the Food Stamp Program (FSP), the largest of the nutrition assistance programs, States have the option to include nutrition education activities for food stamp participants and eligible non-participants as part of their administrative operations. The scope of food stamp nutrition education (FSNE) has expanded greatly since its inception. In 1992, only seven States offered USDA-funded food stamp nutrition education with Federal expenditures of \$661,000. In Fiscal Year (FY) 2004, Federal expenditures for FSNE were approximately \$147 million.¹ As with other FSP administrative costs, FSNE expenditures may be reimbursed at 50 percent.

Overview of Nutrition Education in the Food Stamp Program

The goal of food stamp nutrition education is to provide educational programs that increase, within a limited budget, the likelihood of recipients making healthy food choices and choosing active lifestyles. While the FSP has always had an option to conduct nutrition education, food stamp agencies are primarily designed to perform the administrative functions associated with food stamp benefits; typically, State and local food stamp offices do not have the staff or expertise to design and implement comprehensive nutrition education programs. Thus, “*State food stamp agencies*” or “*State agencies*” delegate this function, through formal contracts, to other providers of nutrition education within the State—the “*FSNE implementing agencies*.”

The State Cooperative Extension Service is the predominant type of implementing agency, but public health departments, public assistance agencies, university academic centers, and other types of organizations also provide FSNE. Implementing agencies, in turn, usually deliver nutrition education to food stamp recipients through local organizations, or “*local projects or subcontractors*.” Typically, local projects are local-level subdivisions of the implementing agency organizations such as a local cooperative extension office. Subcontractors are local-level entities, such as county health departments, that are independent of the implementing agency organizations and deliver FSNE services under contracts or agreements.

Implementing agencies may also develop collaborative relationships with community and private agencies, and other FNS-funded programs, referred to as “*program partners*” such as the Special Supplemental Nutrition Program for Women, Infants and Children (WIC).

To provide FSNE, State agencies submit an annual plan to FNS that describes the nutrition education activities to be conducted during the upcoming fiscal year along with a budget for those activities. In FY

¹ Federal expenditures totaled \$147 million as of November 2005 and were subject to change.

2004, all FSNE activities had to be compatible with the dietary advice provided in the *Dietary Guidelines for Americans* and USDA's *Food Guide Pyramid*. Approved plans are reimbursed at the level of 50 percent of the allowable costs expended, the same rate provided for other State FSP administrative functions.

Research Questions

This study examined FSNE operations in FY 2004 to address two objectives: 1) to provide a comprehensive and systematic description of nutrition education activities in the FSP, and 2) to identify patterns of program implementation with relevance for future FSNE planning. The key issues and questions addressed by this study are listed below.

1. ***Organizational Structure and Planning Process:*** What is the organizational structure of FSNE within States? To what extent and in what ways is FSNE coordinated with other FNS or other Federal and State nutrition education initiatives? How are State FSNE plans developed? To what extent are State plans implemented as intended?
2. ***FSNE Delivery:*** Who is/are the target audience(s) and what are their primary needs? What is the nutrition content focus of FSNE? To what degree do States rely on different educational delivery methods, and why? In what settings were nutrition education activities conducted? To what extent do State FSNE activities focus on providing information, promoting different attitudes, teaching specific skills, and trying out or practicing new behaviors? To what extent do FSNE participants recognize the link between FSNE activities and the Food Stamp Program?
3. ***Staff:*** What qualifications must FSNE providers meet? What amount of services is delivered by professional versus paraprofessional staff without formal nutrition credentials?
4. ***Monitoring and Evaluation:*** What kinds of records on FSNE participants and services are kept routinely? To what extent and how do States rely on research to make decisions about their FSNE target audience(s), content, and approach?
5. ***Funding:*** What is the total dollar value of resources directed to FSNE? How do the per-capita (recipient and FSP-eligible) costs vary across States? How many States spend more or less than the amount in their FSNE budget and why?

II. Study Methodology

Several data collection methods were used in this study to generate a comprehensive description of FSNE services along with in-depth, qualitative explanations of key issues of interest to FNS.

Data from States' FSNE Plan Documents and Expenditure Reports for FY 2004

The study team abstracted information from each State's approved FY 2004 plan and used the data to: 1) identify implementing agencies for the site visit sampling; and 2) familiarize the site visit interviewers

with the characteristics of the sampled agencies before the site visits. In addition, FNS provided State-level data on approved FSNE budgets and total expenditures for FY 2004.

National Web-Based Surveys of FSNE Agencies

Two web-based surveys were conducted, one involving all State agencies offering FSNE and the other involving all FSNE implementing agencies in FY 2004. Respondents included the State food stamp agency staff responsible for coordination of the State FSNE plan and budget, and persons involved in FSNE administration and fiscal management from the implementing agency. The final survey response rates were: 90 percent for implementing agencies (84 of 93 agencies), and 96 percent for State agencies (50 of 52 agencies).

On-Site Interviews with FSNE Representatives

Project staff conducted open-ended, in-depth interviews with FSNE officials at the State food stamp agencies, implementing agencies and their program partners, local project staff, and local program partners (if applicable). A systematic random sampling method was used to select implementing agencies for the on-site interviews—to ensure appropriate representation of agencies by organizational type, FSNE budget, and geographic distribution. Based on this sample of implementing agencies, the researchers purposively (not randomly) selected their associated State food stamp agencies, local projects, and partners for interviews during the site visits. The final number of interviews conducted were: 31 implementing agency interviews, 24 State-level partner interviews, 27 State agency interviews, 67 local project interviews, 43 local partner interviews, and 32 nutrition educator interviews.

Data Analysis

Data collected for this study were analyzed by: 1) quantitative analysis (e.g., frequencies, means, and percentages) of web-based survey data and financial data; and 2) qualitative analysis of interview data. This final report incorporates findings from the web-based surveys with narrative descriptions of the qualitative interview data. The interview data were used to flesh out the general profiles obtained from the survey data analysis with qualitative information on “how” and “why” certain decisions were made and with specific examples of FSNE operations.

III. FSNE Organizational Structure, Roles, and Responsibilities

The FSNE structure is multi-layered and includes the State food stamp agency, implementing agency, local projects, subcontractors, nutrition educators, and partners both at the State and local levels.

State Food Stamp Agency

Most States had either one implementing agency (60 percent) or two implementing agencies (28 percent). The number of implementing agencies by region ranged from a high of 16 agencies in the Southeast to a low of 7 agencies in the Mid-Atlantic.

The role of State agencies varied widely, depending on the activity and on the type of implementing agency. Results from the self-reported surveys show that although 28 percent were very involved in the selection of the target audience, and funding decisions related to implementing agencies, far fewer were very involved in message development (13 percent), identification of delivery methods or materials (11 percent), funding decisions related to local projects (15 percent), or selection of local projects (15 percent). While on average, 63 percent of State agencies characterized their involvement as “very active,” they were more likely to be very active with the local public health departments, emergency food providers, or tribal programs, and less active when the implementing agency was a university or a State or Territorial health department.

Implementing Agency

In FY 2004, 88 percent of implementing agencies described themselves as public organizations. The majority of all implementing agencies (55 percent) were Cooperative Extension Services (CES) of land grant universities. The remaining 45 percent represented a wide range of organizations, including a division of a State or Territorial health department (9 percent), an emergency food provider such as a food bank or pantry (8 percent), and a nutrition or public health school/department/college within a university (7 percent).

The implementing agency was the lead decision-maker in almost all FSNE activities. Implementing agencies developed the goals and objectives for FSNE, made funding decisions related to local projects and overall allocation of resources, trained nutrition educators, and conducted monitoring and evaluation to ensure that FSNE was implemented as intended. While most implementing agencies had local projects and/or subcontractors to provide direct and indirect education, they themselves implemented social marketing campaigns. If affiliated with a university, the implementing agency was more likely to conduct research projects that supplemented the work of the local projects or subcontractors.

Nutrition Networks

In FY 2004, 27 implementing agencies (33 percent) reported using a nutrition network to provide FSNE and coordinate it with other nutrition education. Of these, 67 percent (18 agencies) stated that the network was a part of a larger FSNE initiative. Only five agencies indicated that they had contracts with the State food stamp agency as a nutrition network independent of other FSNE activities.

The nutrition networks included a variety of State government, local government, and nonprofit agencies. The State agencies most often represented in these networks were the Cooperative Extension Service (89 percent), State food stamp agency (81 percent), emergency food providers (73 percent), and WIC program within the State health department (67 percent).

Local Projects, Subcontractors, and Nutrition Educators

Approximately 73 percent of implementing agencies used local projects (40 percent), subcontractors (19 percent), or both (14 percent) to deliver some or all of FSNE services. The choice to use local projects or subcontractors was associated with the type of implementing agency. Most of the Cooperative Extension Services used their county (local) extension offices to deliver FSNE; State or Territorial health departments tended to use subcontractors to deliver FSNE (87 percent).

Local projects and subcontractors typically felt that they were centrally involved in decision-making about the local implementation of FSNE services. Seventy-one percent of local projects and subcontractors reported that they made the decisions; 29 percent indicated that implementing agencies were responsible for decision-making. Key areas for local decision-making were: recruiting and selecting local partners, identifying the target audience, and developing content of nutrition education services. Based on guidance they received from the implementing agency about target populations, core nutritional messages, and acceptable methods of delivery, local projects felt they had the autonomy to make decisions that would be most beneficial to their community.

Implementing agencies relied on nutrition educators to provide direct education to clients, regardless of whether the educators were staff of the local project/subcontractor or the central implementing agency office.

FSNE Partners

The partnerships in FSNE were very diverse and extensive, at both the implementing agency and local levels. One-third of implementing agencies used an advisory committee or working group that provided input on policy decisions or helped establish coordinating mechanisms as part of FSNE planning and implementation. Among these agencies, the most commonly cited organizations were State Cooperative Extension Service offices and State and/or local health departments (73 percent and 69 percent, respectively). Three-quarters (73 percent) of implementing agencies coordinated FSNE activities with at least one U.S. Department of Agriculture (USDA), FNS food and nutrition assistance program, such as WIC, the National School Lunch Program, or Team Nutrition. The nutrition network partners provided another mechanism for coordination.

At the local level, partners typically provided access at their sites to low-income audiences for nutrition education. Local partners either operated independently in the community (e.g., a school district, a local food bank), were a local office of a larger State initiative (e.g., a local WIC office, a Head Start site), or associated with job training related to Temporary Assistance for Needy Families (TANF), family education, or self-sufficiency projects.

Local Food Stamp Offices

Nineteen percent of the local projects and subcontractors reported food stamp office involvement in FSNE planning or implementation. Food stamp office involvement usually consisted of distributing nutrition education brochures and materials. The primary barrier to their involvement in FSNE was limited personnel resources or physical space to direct towards nutrition education.

IV. FSNE Planning

FSNE plan development involves the following steps: 1) the implementing agency develops a plan, independently or together with local projects or subcontractors; 2) the State agency reviews the plan and works with the implementing agency to refine it; and 3) the State agency submits a single State FSNE plan to the FNS Regional Office for approval, as requested in the FSNE Plan Guidance.

Needs Assessment and Identification of Target Audience

Most implementing agencies (72 percent) reported that they conducted needs assessments for FSNE, but most of these assessments focused on identifying and locating low-income audiences, not their nutrition education needs. As recommended by the FY 2004 FSNE Plan Guidance, a majority of implementing agencies used existing data as the primary basis for needs assessment. They requested that State food stamp agencies provide FSP data, including participation data for all areas of the State and at the county level, or data on the demographic characteristics of participants (61 percent, 55 percent, and 45 percent, respectively).

In FY 2004, nearly three-quarters of State agencies asked implementing agencies to make food stamp recipients and applicants a high priority but allowed implementing agencies to target broader low-income populations. Only one State agency required implementing agencies to serve only food stamp recipients and applicants. The majority (52 percent) of implementing agencies targeted the low-income population with household income up to 185 percent of poverty as their primary audience in FY 2004. Slightly less than one-third of the agencies targeted FSP recipients and eligibles. Just 8 percent targeted only FSP recipients and applicants. The majority of implementing agencies used other demographic factors along with income in defining the target audience for FSNE, most commonly age (used by 65 percent of all implementing agencies), race and ethnicity (50 percent), and family status (39 percent). The demographics of the actual audience for FSNE are described in Section V.

Selection of Nutrition Education Curriculum and Topics

According to the FY 2004 FSNE Plan Guidance, the content of FSNE services must be science-based nutrition education intervention that is focused on health promotion and primary prevention of diseases through healthy diets and physical activities.

Selection of educational messages and curricula was based on past experience and on testing. A common practice was to use the messages and curricula that had been used for FSNE in the past.

In FY 2004, 71 percent of implementing agencies indicated that they tested some or all of their educational messages, commonly through methods such as focus groups with food stamp recipients or with other low-income audiences (43 and 52 percent, respectively).

Implementing agencies and local projects typically sought to increase participants' knowledge and to promote behavior change. The most commonly cited topics in local projects' nutrition education plans were: the importance of eating fruits and vegetables; nutritional quality of diets, food safety, the importance of physical activity, and food resource management.

Budget Development

In order to obtain FNS approval, proposed budgets were required to include detailed information to show that planned activities were allowable, planned expenditures were reasonable and necessary, and allowable non-Federal funding for 50 percent of expenses would be provided.

FSNE budget development activities in FY 2004 were conducted primarily by the implementing agencies and their local projects/subcontractors. Nearly two-thirds (63 percent) of implementing agencies with local projects or subcontractors provided a budget format for the local projects or subcontractors to prepare their own budgets. Implementing agencies also provided training and assistance to local projects on issues such as: how to interpret FSNE Plan Guidance, allowable costs, what qualifies for non-Federal FSNE funds, and how to develop partners.

About half of the local projects interviewed reported encountering problems during the process of budget development. The problems cited included: securing sufficient non-Federal funds, determining how to include private contributions, definitions of allowable costs, and finding adequate program space. In some of these cases, projects settled for less money than they had hoped for or eliminated some planned activities.

Approval of Local Project and Implementing Agency Plans

During the review of implementing agency and State plans, most implementing agencies and local projects experienced no problems. One in five implementing agencies with local projects or subcontractors denied funding for FY 2004 to a local project or subcontractor. The main reasons for these decisions were: local projects' inability to provide qualifying non-Federal contributions, insufficient plan documentation, and inconsistency between the selected target audience and implementing agency priorities. Only 8 percent of State agencies (four States) denied an implementing agency's request for FSNE funding. The reasons for denial included: the proposed FSNE activities were not consistent with priorities of the State agency, or the proposed activities duplicated services already underway or planned by another organization. Other reasons related to inconsistencies with the Federal FSNE Plan Guidance, such as: inclusion of an inappropriate target audience in the proposal, lack of appropriate non-Federal funds, and inclusion of non-allowable costs.

Conformance to the FSNE Plan Guidance and prior experience in FSNE were the most common criteria for States' approval of implementing agencies to be included in the State FSNE plan in FY 2004. Two-thirds of State agencies chose implementing agencies based on their prior experience. About one-third (34 percent) of the State agencies approved any potential implementing agency that submitted plans meeting the FSNE Plan Guidance requirements.

The majority of implementing agencies surveyed (88 percent) stated their FY 2004 FSNE plan was fully or mostly implemented as approved. Staffing shortages, shortfalls in non-Federal funding, and problems with partnerships were main reasons for the deviations in plan implementation. When there were deviations from the plan, the changes generally involved offering fewer classes or changing class locations, so changes rarely affected their service goals, messages, or delivery model.

V. Delivery of FSNE

In FY 2004 the four core areas of Improved Dietary Quality, Food Security, Food Resource Management, and Food Safety formed the conceptual framework on which implementing agencies based their activities. Within the context of the four core areas, implementing agencies typically emphasized multiple guidelines for their target populations: 98 percent of implementing agencies used

“Be physically active each day,” 99 percent used “Let the Pyramid guide your food choices,” and 99 percent used “Choose a variety of fruits and vegetables daily.”

Scope of Services

FSNE services were provided in most counties (82 percent) across States in FY 2004. Forty-two percent of State agencies reported that every county in their State was served.

In FY 2004, FSNE agencies did not collect or report participant demographic data using a standardized format or data management system. The implementing agency survey obtained these types of data, but the reporting was not consistent. While 89 percent of implementing agencies reported at least one demographic category, only one-third of agencies reported on all the demographic characteristics listed below.

According to the survey, FSNE served the following groups of participants in FY 2004:

Age. School-aged children (5–17 years) and adults (18–59 years) comprised the largest cohorts (42 percent and 36 percent, respectively) of FSNE participants, the remainder being elderly, young children, and infants.

Gender. Females constituted the majority of the FY 2004 FSNE participants; there were more than twice as many females as males (70 and 30 percent, respectively).

Race/Ethnicity. By race, 59 percent of participants were white, 23 percent were black/African-American, and 8 percent were American Indian/Alaskan Native. Approximately 20 percent of FSNE participants were identified as Hispanic or Latino (regardless of race).

Food Stamp Recipients. Just over half (51 percent) of FSNE participants were food stamp recipients or applicants, while 23 percent were income-eligible non-participants.

Coordination of Food Stamp Nutrition Education

Implementing agencies were most likely to coordinate with other agencies regarding information and data sharing (96 percent), plan development (88 percent), and message delivery (87 percent). Development of FSNE budgets, program evaluation, and program monitoring were less likely to be coordinated. WIC and the Expanded Food and Nutrition Education Program (EFNEP) were most often coordinated with FSNE; they were most likely to be reported as “well” or “moderately” coordinated.

In FY 2004, 38 percent of implementing agencies had formal collaborative relationships with other nutrition education initiatives in their State to provide FSNE. Most common collaborators were State Departments of Education (45 percent) and other university or academic centers (39 percent).

Methods of Delivery

For purposes of this study, three FSNE delivery methods were defined: direct education, indirect education, and social marketing. (The reader should refer to the Key Word Definitions for these terms.)

The vast majority (98 percent) of implementing agencies provided direct education. The settings used for direct education included: public schools (81 percent), WIC clinics (75 percent), elderly services sites (73 percent), emergency food assistance sites (68 percent), and youth education sites such as YMCAs and preschools (66 percent). Multiple group sessions were the most commonly used mode for direct education in these settings.

Most (87 percent) implementing agencies also offered indirect education. These activities included distribution of print materials and public events such as health fairs (96 percent and 85 percent, respectively, of agencies using indirect education).

About one-third of implementing agencies conducted social marketing campaigns in FY 2004. Of those agencies, 48 percent conducted a Statewide campaign.

One of the key elements in a successful Statewide social marketing campaign was to involve multiple programs in reinforcing the message, and social marketing was strongly associated with nutrition networks. Of the 27 implementing agencies with a nutrition network, 17 employed social marketing. Only nine implementing agencies that did not have a nutrition network conducted social marketing. The most frequent channel of social marketing delivery was radio (62 percent), followed by television (46 percent), newspapers, and posters (each 42 percent). About a quarter of implementing agencies used mass distribution of materials through local food stamp offices for social marketing (27 percent). Almost half of the implementing agencies used four or more channels to deliver their social marketing.

Instructional Materials, Curricula, and Languages Used

Implementing agencies drew upon many different sources to obtain nutrition education curricula and materials. FNS was cited most often as the source for FSNE materials (77 percent). Other commonly reported sources included the implementing agency itself (75 percent), another implementing agency (74 percent), another USDA agency (71 percent), and another Federal organization (70 percent).

While almost all implementing agencies used some research-based curricula, there was wide variation in the specific curricula chosen. The most commonly used were Fight BAC (81 percent), Eat Smart, Play Hard (73 percent), and Nibbles for Health (47 percent). In addition, the FNS curriculum Power of Choice was used by 39 percent of implementing agencies; 27 percent reported using Changing the Scene, and 19 percent reported using YourSELF.

Almost all implementing agencies used two or more languages in FSNE service delivery; 28 percent used three or more languages other than English. Ninety percent of implementing agencies used materials or conducted activities in Spanish.

FSNE as a Benefit of the Food Stamp Program

While almost all State agencies (94 percent) *viewed* FSNE as one of the benefits of a Food Stamp Program, a smaller group (66 percent) *actively promoted* FSNE as a Food Stamp Program benefit. Similarly, 88 percent of implementing agencies *viewed* FSNE as one of the benefits of FSP, but somewhat fewer *identified* it to clients as a FSP benefit (78 percent). During interviews, implementing agencies and local projects described their hesitancy to “over-promote” FSNE as a part of the FSP. There were fears that associating with the FSP would be a barrier to client participation. In fact, many implementing agencies did not discuss the link with the FSP except on printed materials, because they perceived that members of the FSNE audience were sensitive to being associated with the FSP, whether they were recipients or not.

All stakeholders—implementing agencies, local projects, State agency, and partners—were quick to note that FSNE participants saw the local project or subcontractor as the provider of nutrition education rather than the FSP and that they may not have understood the link between FSNE and the Food Stamp Program.

This hesitancy towards closely tying FSNE to the FSP resulted in the perception by State agencies that participants were probably not aware of the link. Only 4 percent of State agencies believed that FSNE participants “very much recognized FSNE as a FSP benefit” (Exhibit A5-12). Instead they were more likely to think that FSNE participants “somewhat recognized” FSNE as a benefit (45 percent), had little recognition of FSNE as a benefit (35 percent), or had no recognition of FSNE as a FSP benefit (10 percent).

VI. FSNE Program Management and Evaluation

Successful management of FSNE services requires adequate staffing, monitoring of educational activities, and financial management. Another key to success for FSNE is evaluating the extent of program implementation and impact.

Staff Qualifications and Staff Training

In FY 2004, a majority (70 percent) of FSNE staff involved in direct service delivery had a **Bachelor’s degree or higher**. However, in general, nutritionists/dietitians and staff with a Master’s degree (totaling 40 percent) typically supervised nutrition educators rather than conducting educational activities, and the minimum educational requirement for nutrition educators was a high school diploma or GED. This suggests that nutrition educators were mostly staff with a Bachelor’s degree or less, constituting 59 percent of FSNE service delivery staff.

Most implementing agencies (83 percent) offered training to their staff and/or local project staff on a regular basis. Local project staff were uniformly satisfied with the amount of training their staff received.

Monitoring the Implementation of FSNE Activities

In FY 2004, all States collected some data on the number of clients served by FSNE, but the type of FSNE activity data collected varied across different service delivery methods—direct education, indirect education, and social marketing.

For direct education initiatives, most implementing agencies kept records in a way that allowed reporting of the number of individual participants, rather than the contact counts that were requested by the FY 2004 FSNE Plan Guidance. The most common way of reporting participation was to count the number of individuals who received FSNE service at least once during a reporting period regardless of how many times or classes the person participated (three-quarters of implementing agencies in 46 States).

The indirect education activities were most commonly tracked by counting the number of items (flyers, newsletters, etc.) distributed (73 percent of implementing agencies in 42 States).

Overall, 73 percent of the 26 implementing agencies using social marketing collected some type of data—usually multiple types—on the reach of the marketing campaign. For example, 58 percent of these agencies (in 15 States) tracked the number of times social marketing messages were delivered; 50 percent (in 12 States) recorded demographics of populations exposed to social marketing messages through media estimates of reach and placement.

Some State agencies have expanded their involvement in the monitoring of FSNE activities beyond the review of annual FSNE reports. Additional activities include: conducting on-site reviews of local FSNE projects (reported by 48 percent of implementing agencies in 21 States); interviewing the implementing agency staff (48 percent, 21 States); and holding regular meetings with the implementing agency (46 percent, 25 States). Overall, most implementing agencies felt that their monitoring system allowed them to meet State agency requirements.

Financial Management

Over one-half of States received audit reports on their implementing agencies' FSNE spending in FY 2004. Nineteen percent of States audited their implementing agency's FSNE financial records; while 23 percent received reports from internal audits conducted by implementing agencies, and one State commissioned an independent audit of its implementing agency.

Financial audits or reviews of FSNE spending were conducted for a large majority of local projects in FY 2004. Fifty-three percent of implementing agencies (in 28 States) used their staff to audit or review their local projects' finances. Ten percent of implementing agencies commissioned an independent audit (in six States); and another 10 percent reported that their local projects or subcontractors commissioned independent audits of their FSNE spending (in six States).

Evaluation

Overall, information collected in this study regarding FSNE evaluation was limited and ambiguous. In terms of formative evaluations, 71 percent of implementing agencies reported that they tested their

educational messages, using methods such as focus groups and interviews of food stamp recipients and other low-income groups. Nutrition educators further explained that, even when no formal method for assessing materials' effectiveness was in place, anecdotal feedback from participants provided them with useful information on the materials being used for FSNE.

Evaluation regarding implementation of nutrition education services consisted mainly of collecting monitoring data on social marketing and direct and indirect education services such as: the number and frequency of message delivery, and counts of participants in educational activities. Implementing agencies used these data primarily to satisfy their State agency's reporting requirements.

The majority of implementing agencies (74 percent) reported that they conducted outcome evaluations on at least some aspects of FSNE services in FY 2004. However, their explanations often did not distinguish between FSNE activity monitoring and outcome evaluations. Of the implementing agencies that were interviewed, staff from 17 agencies described their outcome evaluations. They suggested that these evaluations focused on behavior change among participants (outcome) and the extent of program utilization (process monitoring, e.g., the number of participants, the number of repeat contacts, and the number of events held). Seventy-seven percent of the implementing agencies interviewed indicated that their outcome evaluations were not conducted by an outside evaluator, raising questions regarding the reliability of findings from these studies. Implementing agency and local project staff described various factors as impediments for conducting outcome evaluations, such as difficulty in designing evaluation instruments and a lack of resources (either money or time).

Nonetheless, 50 percent of the implementing agencies interviewed believed that their outcome evaluations found positive behavior change among clients, and 66 percent felt that their data were reliable.

VII. FSNE Budgets and Outlays

Limitations of Data for the Financial Analysis

Although the survey requested financial data that all implementing agencies are expected to maintain, in the budget categories specified by the FY 2004 FSNE Plan Guidance, there were frequent gaps and inconsistencies in the data provided by the implementing agencies. Study staff resolved most of these problems, and total budget and outlay data were analyzed for 72 of the 84 implementing agencies that responded to the survey. (These 72 agencies formed the "final analysis sample.") There were, however, only 42 implementing agencies with usable data on the composition of FSNE outlays by type of expense, and 39 with usable data on the composition of outlays by source of funds, due to missing and inconsistent data. These more detailed outlay data are presented with more caution but they are nonetheless informative.

FY 2004 FSNE Budgets and Outlays

FNS approved FSNE plans totaling \$228 million in Federal funds for FY 2004. Based on implementing agency data collected for the study, State budgets for FY 2004 totaled \$242 million in non-Federal funds. Thus, the grand total budgeted from the implementing agencies' perspective was

\$470 million. Implementing agencies often obtain commitments from providers of non-Federal funds that exceed the requested amount of Federal funds, but they are entitled to claim reimbursement for 50 percent of allowable outlays.

Outlays for FSNE totaled \$295 million in FY 2004, including \$147 million in Federal outlays and \$148 million in non-Federal outlays. Among the States, the range was from \$20,000 to \$65 million, while the median total outlay of Federal and non-Federal funds was \$3.5 million.

On average across the Nation, total FSNE spending was \$12.39 per FSP participant, or \$3.62 per low-income person (with income below 185 percent of the Federal poverty level). States varied considerably in the level of FSNE spending relative to the size of the target population. The median FSNE outlay—the best descriptor of the “typical” State— was \$11.21 per FSP participant, with 25 percent of States spending less than \$5.83 per FSP participant and another 25 percent spending between \$19.40 and \$106.29.

Most State food stamp agencies did not view their internal FSNE outlays as large enough to justify the effort to separate them from general FSP administrative expenses. Only four State agencies reported their own staff time or other internal costs as a FSNE outlay. Two State agencies indicated plans to hire staff to oversee FSNE and claim these positions as FSNE expenses.

Half of the implementing agencies spent 90 percent or more of their budgets, according to the survey data. Most implementing agencies (81 percent) did not spend their entire budgets, but the percentage remaining tended to be relatively small. A few large implementing agencies had large amounts of unspent funds, skewing the relationship of budgeted funds (\$470 million) to outlays (\$295 million) at the national level.

When implementing agencies were unable to spend substantial portions of their budgets, common problems were cooperation of partners, staff turnover, and delayed start-up. A few implementing agencies indicated that they intentionally underspent their budgets, as a way to make sure they did not overspend.

Non-Federal Funds

Approximately one-third of non-Federal funds reportedly came from the implementing agency itself, and another one-third from State land-grant universities (according to data from the 39 implementing agencies providing complete and valid data on the sources of FSNE funds in FY 2004). Other sources of non-Federal funds included local public education agencies (10 percent in this sample), other public agencies (13 percent), private non-profit organizations (4 percent), and Indian Tribal Organizations (3 percent). State food stamp agencies provided 4 percent of reported non-Federal funds spent by implementing agencies on FSNE.

Several factors affected the amount of non-Federal contributions that were actually received from partners, including: partners’ interest; ability to prove that they served the target low-income or food stamp eligible population, availability of allowable funds, willingness to complete paperwork, budget cuts or changes in priorities at partner agencies, delays in startup leading to partners being unable to fit FSNE into their schedules (most often involving schools), and availability of space to provide FSNE.

Implementing agencies usually received non-Federal funds in the form of partners' contributions of staff time and other expenses in support of FSNE, not in the form of outright grants. Implementing agencies were eligible to claim Federal reimbursement for these expenses, but they did not pass on the reimbursement to the partners. Instead, they used these funds for other expenses that did not have non-Federal sources of funds. This approach is quite different from the way that most FSP administrative expenses are funded, with staff positions and other expenses supported jointly by Federal funds and by State and local revenue appropriated specifically for this purpose.

The amount of non-Federal outlays reported to FNS in some States may understate the full value of the contributions of non-Federal funds by implementing agencies and partners for approved FSNE activities. Although implementing agencies were allowed to claim Federal reimbursement for 50 percent of approved outlays, on average they reported spending more non-Federal funds than the amount of Federal funds claimed on their behalf. Constraints in financial processes at the State and implementing agencies affected the balance of Federal and non-Federal outlays. A key constraint was the implementing agencies' uncertainty about the actual amount of non-Federal funds that would be contributed by partners.

VIII. Comparison of FY 2004 FSNE Study Findings to the 2005 Guiding Principles

Implications for the FSNE Guiding Principles

On September 15, 2005, FNS released the "FSNE Guiding Principles," a policy document containing six overarching principles designed to provide the big picture and future direction for food stamp nutrition education. The document identifies standards of excellence towards which FSNE efforts should strive and delineates the roles and responsibilities of key stakeholders, including FNS, State food stamp agencies, implementing agencies, local offices/subcontractors and local food stamp offices. The Guiding Principles were first incorporated in the annual FSNE Plan Guidance issued by FNS for FY 2007 for operational implementation.

Although FSNE stakeholders did not operate under the Guiding Principles in FY 2004, a comparison of the study findings to the standards of excellence outlined in the Guiding Principles is useful. The comparison offers a baseline measure of how close FSNE operations in FY 2004 were to reaching the ideals of the Guiding Principles, recognizing that some programmatic changes may have occurred in the interim. The study data also identify some successful practices and potential barriers facing FSNE providers as they strive to meet these ideals in future years.

Guiding Principle 1: Food Stamp Nutrition Education is intended for Food Stamp Program recipients and individuals eligible for the Food Stamp Program.

Federal law and FNS regulations require that Food Stamp Program recipients and eligibles be the primary target of FSNE. Overall, the study findings indicate that FSNE providers make strong efforts to find and serve food stamp recipients. Nearly three-quarters of State food stamp agencies reported that they asked implementing agencies to make food stamp recipients and applicants a high priority. Implementing agencies estimate that just over half of FSNE participants are food stamp recipients, with an additional 23 percent being income eligible but not participating.

One of the challenges noted by State and local FSNE providers was that they have not been effective in identifying which FSNE participants are actually food stamp recipients. Where services were provided in sites such as a TANF work incentive program, a food bank, or in low-income housing centers, it was much easier to determine whether potential FSNE participants were eligible for food stamp benefits. Identifying food stamp recipients was not as easy, however, when services were provided in schools, at community events, or in general gathering places such as health fairs or in grocery stores.

Guiding Principle 2: FSNE is a set of learning experiences designed to facilitate the voluntary adoption of eating and other nutrition behaviors conducive to the health and well-being of individuals on a limited budget.

Most of the implementing agencies indicated that they use multiple elements of the Dietary Guidelines for Americans, and that they focus on both providing information and trying to promote behavioral changes. Interview data suggest that nutrition education was provided within the context of a client's limited budget. This study did not collect data on FSNE outcomes, but it did examine the efforts of implementing agencies to evaluate FSNE. Of implementing agencies that conducted outcome evaluations, a majority reported using in-person client interviews or surveys to collect data—typically self-report, pre-post data, including dietary recalls; and 50 percent found positive behavioral change. However, it is important to note that the quality of efforts designed to measure behavioral change was not examined.

Guiding Principle 3: FSNE has the greatest potential impact on the nutrition-related behaviors of the overall food stamp population when it targets women and children in food stamp-eligible households.

Agencies reported that most FSNE activities were directed at women and children. Implementing agencies indicated that 42 percent of FSNE participants were children and 25 percent were adult women. In addition, 81 percent of implementing agencies provided direct education to children in public schools, and 75 percent provided direct education in youth education sites such as YMCAs and preschools.

Guiding Principle 4: FSNE uses science-based behaviorally focused interventions and can maximize its national impact by concentrating on a small set of key outcomes.

There was considerable variation among implementing agencies in regard to use of science-based interventions. While most implementing agencies used tested materials, they often had not tested their messages with new target audiences. Implementing agencies using the social marketing approach were most likely to test their messages. Other implementing agencies conducted direct delivery with curricula that had either been tested in the past by their agency or by other FSNE providers.

Guiding Principle 5: FSNE can maximize its reach when coordination and collaboration take place among a variety of stakeholders at the local, State, regional, and national levels.

There were mixed results with regard to the coordination of nutrition education and collaboration among stakeholders. With regard to USDA-funded programs, as expected, almost all implementing agencies (84 percent) reported coordination of FSNE with WIC, and 81 percent reported coordination with EFNEP. Coordination with non-FNS funded entities was significantly less prevalent, with only 38 percent of implementing agencies reporting coordination efforts. About one-third (32 percent) used a nutrition

network as a formal coordinating mechanism. Most often, coordination was prevented by either a lack of interest on the part of either or both parties, or a lack of resources to promote coordination.

Levels of coordination also varied at the local level. Most local partnerships involved a partner agency that had access or provided services to the FSNE target population, such as a TANF job training program or a school located in a low-income area. Many local projects relied on their partners to provide the audience for FSNE and considered this arrangement to fall within the definition of local coordination.

Guiding Principle 6: FSNE is enhanced when the specific roles and responsibilities of local, State, regional, and national food stamp agencies and nutrition education providers are defined and put into practice.

The explanation of this Guiding Principle clearly identifies the expected roles and responsibilities of various constituents involved in FSNE. Implementing agencies, local projects and subcontractors, and program partners all played an active role in conducting FSNE in FY 2004, and were close to meeting the roles laid out under this Guiding Principle.

With regard to State food stamp agencies, there were mixed results. Since its inception, FSNE has been planned and delivered by agencies not affiliated with the State food stamp agency. Several State agencies had taken steps to expand their role from prior years in relationship to their implementing agencies, the FNS Regional Offices, and program partners. These State agencies were becoming more involved in the areas of FSNE program planning, administration, and monitoring. On the other hand, there were still some State food stamp agencies that saw FSNE as a pass-through and did not want to be involved.

Local food stamp office involvement also varied, with 46 percent of implementing agencies reporting having delivered FSNE at local food stamp offices in FY 2004. The primary uses of local food stamp offices were for one-time classes and distribution of educational materials. Most local FSNE providers reported that local food stamp offices lacked the resources, interest, or motivation to participate in FSNE. Even in some States where the State food stamp officials were highly involved in FSNE planning and implementation, there were challenges to convincing local food stamp offices to become involved in FSNE.

In summary, study findings indicated that striving to achieve the standards of excellence in the FSNE Guiding Principles will be relatively easy in some areas, while others will require a great deal of work.

CHAPTER I. INTRODUCTION

The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA) has taken a leadership role in promoting nutrition education for low-income Americans. Through its food assistance programs, FNS has provided significant funding to State and local programs to provide nutrition education to food assistance program participants, as well as potential participants. USDA is in a unique position to support nutrition education efforts directed at low-income individuals. According to FNS, one in five Americans are touched by one or more of the FNS nutrition assistance programs.² Over the past ten years, the nutrition education efforts in all of these programs have expanded greatly, but it is through the Food Stamp Program (FSP) that FNS has the potential to reach the largest number of low-income Americans.

Under the FSP regulations, States have the option to include nutrition education activities to food stamp participants and applicants as part of their administrative operations. Nutrition education in the FSP is considered by FNS to be a critical element in supporting the Department's goal of facilitating the voluntary adoption of healthy eating and other positive nutrition-related behaviors conducive to the health and well-being of low-income Americans. As a result, Food Stamp Nutrition Education (FSNE) has expanded greatly, in terms of the number of States that provide nutrition education, as well as in the amount of Federal funds expended. In 1992, only seven States had USDA-funded food stamp nutrition education programs with a total budget of \$661,000. In Fiscal Year (FY) 2004, the Federal budget for FSP nutrition education was approximately \$228 million. As with other FSP administrative costs, FSNE expenditures may be reimbursed at 50 percent.

The primary goals of this study were to provide a comprehensive description of the status of FSP nutrition education programs around the country in FY 2004, and to identify patterns of program implementation with relevance for future FSNE planning.

Overview of Nutrition Education in the Food Stamp Program

USDA promotes optimal health and well-being through improved nutrition, and USDA encourages well-designed nutrition education efforts within the nutrition assistance programs as a critical component to attaining this goal. For the Food Stamp Program, the goal of nutrition education is to provide educational programs that increase, within a limited budget, the likelihood of recipients making healthy food choices and choosing active lifestyles. In particular, nutrition education in the FSP is intended to:

- Assist food stamp households to adopt healthy eating and active lifestyles that are consistent with the *Dietary Guidelines for Americans* and USDA's *MyPyramid*;³
- Ensure that food stamp households have an adequate supply of food and that people eligible for the FSP (but not participating) are made aware of the program benefits and how to apply for them as part of the FSP outreach activities;

² Food and Nutrition Service, U.S. Department of Agriculture, 2006. "Nutrition Assistance Programs," <http://www.fns.usda.gov/fns/default.htm>, accessed June 15, 2006.

³ In FY 2004, FSNE used the *Food Guide Pyramid*. In FY 2005, this document was updated and entitled *MyPyramid*. The *Dietary Guidelines for Americans* were updated in 2005 as well.

- Improve food stamp households' safe handling, preparation, and storage of food; and
- Enhance practices related to thrifty shopping and preparation of nutritious foods by food stamp households.

As the largest of the Federal nutrition assistance programs, the FSP has a significant stake in ensuring that nutrition education works to meet these objectives.

Key Stakeholders in FSNE Administration and Delivery

The FSNE services are administered within an organizational structure that includes the following stakeholders:

- ***State food stamp agency:*** The State agency responsible for administration of the Food Stamp Program and FSNE. As specified by law, the State agency is the primary FNS grantee for FSNE. State food stamp agencies do not directly deliver nutrition education, however, because they do not have this capability in-house.
- ***Implementing agency:*** An organization that has a contract or agreement with the State food stamp agency to deliver food stamp nutrition education. The implementing agency is the primary unit of FSNE program planning, operations, and financial management. In the FY 2004 FSNE Plan Guidance, implementing agencies are also referred to as "subgrantees," since the primary grantee is the State food stamp agency.⁴
- ***Local projects:*** Many implementing agencies have subdivisions at the level of implementation, e.g., a local Cooperative Extension office and the county health department. These local-level entities are components of the organization serving as FSNE implementing agency. In the FY 2004 FSNE Plan Guidance, local projects and subcontractors that are operated under agreement with the implementing agencies are known as sub-subgrantees.
- ***Subcontractors:*** Independent organizations that are contracted or have a formal agreement with an implementing agency to provide FSNE services. Subcontractors are not local-level units of the implementing agencies and thus operate more independently of implementing agencies in FSNE service delivery, compared to local projects. For example, an implementing agency, such as a State health department, might contract with county health departments that have their own governance structure.
- ***Partners:*** An agency or entity that has a formal or informal partnership with an implementing agency, a subcontractor, or a local project to inform, coordinate, support, and/or share FSNE activities.
- ***Nutrition educators:*** FSNE staff who are responsible for providing direct nutrition education to the target population.

⁴ The *Food Stamp Nutrition Education Plan Guidance, Federal Fiscal Year 2004* was published in March 2003. This document is updated each year.

Types of Organizations That Serve as Implementing Agencies

State agencies have contracted with many different types of agencies and organizations to design and implement nutrition education services in their states.

State Cooperative Extension Services

The most prevalent type of organization with which State food stamp agencies have contracted for nutrition education services is the Federal/State Cooperative Extension system. In 1968, USDA began the Expanded Food and Nutrition Education Program (EFNEP), a program designed to provide nutrition education to low-income youth and families with young children through Cooperative Extension Services operated by State land-grant universities. In these programs, county extension agents train and supervise paraprofessionals and volunteers, who teach a prescribed nutrition education curriculum to individuals. The EFNEP programs measure participants' nutrition-related behaviors, attitudes, and intentions at program entry and exit on common instruments and report the data to USDA through a common reporting system.

Many State agencies found the EFNEP model to be the ideal vehicle for the provision of FSNE activities. The Cooperative Extension agencies have utilized FSNE to expand the scope of traditional EFNEP-type activities (primarily one-on-one counseling and group classes) and to target nutrition education to food stamp participants and eligibles whom the EFNEP does not reach. The FY 2004 FSNE Plan Guidance specifies that the FSNE audience be food stamp recipients or eligibles, and that FSNE does not duplicate EFNEP activities.

Nutrition Networks

In 1995, FNS provided seed money to establish nutrition support networks in 22 States. The networks brought together State and local government agencies, nonprofit organizations, and representatives of private industry to coordinate the delivery of nutrition education designed specifically for families and individuals participating in the Food Stamp Program. The networks were designed to support the planning and development of a collaborative nutrition education/promotion campaign for FSP participants. They were also designed to promote the *Dietary Guidelines for Americans* by incorporating key messages into all Statewide nutrition education/promotion activities for the target audience and expanding the reach and approach of current State nutrition education efforts by the use of social marketing methods in planning activities. The current participation of nutrition networks in FSNE is described in Chapter III.

Other Providers

Other providers of nutrition education have been included in the States' nutrition education efforts. These programs may operate along with the traditional Cooperative Extension programs or a nutrition network, but address a specific target population or administrative need. Examples of such organizations are State Departments of Social Services or Public Health and university nutrition education programs not affiliated with the Cooperative Extension.

Some "local-level" organizations, such as food banks, also are contracted by State food stamp agencies to provide nutrition education. Contractually, they are equivalent to other types of implementing agencies (such as the Cooperative Extension Services at land-grant universities) but operationally they only have local-level services.

State Plans, Budgets, and Waivers

The basis of the State agency administrative responsibility for the FSP is the Federal-State agreement in the State Plan of Operation. This Plan of Operation, submitted annually, contains the required planning document regarding all of the State's administrative functions, including the State's proposed budget and sources of State contributions. All administrative functions described in the State Plan of Operations, if approved by FNS, are funded jointly by State and Federal governments with a 50 percent Federal reimbursement. The FSNE Plan is an optional section of the FSP Plan of Operation.

It is important to note that FSP nutrition education funds are not awarded as grants, in which a fixed dollar amount is provided for specific activities or in which funds may be carried over from one fiscal year to the next. Rather, States receive Federal administrative funds through a provision of the food stamp law that authorizes the Federal government to reimburse States for allowable administrative costs. If a State receives approval from FNS for its State FSNE plan, FNS will reimburse the State for 50 percent of its actual, allowable expenditures, the same rate provided for most State FSP administrative functions. A State, therefore, defines the scope of its FSP nutrition education services in a given fiscal year by the amount of State and local expenditures that support the approved nutrition education activities.

State agencies wishing to include nutrition education in their programs contract with other providers of nutrition education within the State—the **FSNE implementing agencies**. Once agreements are established between the State food stamp agency and the agency(ies) implementing FSNE, the State must consolidate all of the activities into a single State plan. An individual State's plan may have a number of implementing agencies providing FSNE, each administering the programs separately. For example, a State may have both a Cooperative Extension Service and a nutrition network providing nutrition education, with each implementing agency operating separately with its own sources of non-Federal funds. These programs, in turn, may fund local programs, which are administered separately from the State-level programs. However, when the State agency prepares the annual plan for submission to FNS, the programs must be consolidated into a single State plan.

FNS provides States with guidance to assist them with the plan preparation process. A key element among FSNE requirements is that all FSP nutrition education activities must be consistent with the *Dietary Guidelines for Americans* and *MyPyramid*. States are allowed flexibility in determining how to conduct such activities as needs assessment, materials development, message development and delivery, and program evaluation.

States must submit detailed budgets and program narratives to have their plan approved by FNS. The budget must provide details on how the money will be spent and the resources that comprise the State share of the budget. In these budgets, States delineate their program and administrative costs. Program costs are defined by FNS as the costs of salary and benefits, supplies, materials, and travel for the nutrition education. Administrative expenses are defined as the building/space costs, maintenance costs, equipment and other capital expenditures, and indirect costs. For all projects, the State must identify total allowable project costs that the Federal Food Stamp Program can reimburse at the 50 percent administrative reimbursement rate.

As part of the FSNE Plans, States are required to submit final reports that detail the activities from the prior year. These reports provide counts of contacts with individuals and families who participated in FSNE, and, to the extent possible, provide evidence related to changes in behaviors.

Waivers of Federal food stamp regulations are sometimes permitted to implement FSNE plans. Two waivers in particular are important. First, FSNE is intended to target current food stamp recipients and potential recipients. However, FNS allows waivers of this requirement based upon a satisfactory assurance that the sponsoring agencies target primarily low-income FSP eligibles. As was noted earlier, FSNE is designed to provide reimbursement to States for nutrition education expenses. However, State programs often rely on local contributions to support FSP nutrition education activities. A second type of waiver allows State agencies to count cash contributions from private organizations as a part of the States' expenditures for which FNS will reimburse 50 percent.

Purpose of the Study

The last descriptive study of FSNE operations, the *Food Stamp Nutrition Education Study*, was conducted in FY 1997.⁵ A number of factors led FNS to seek an update and develop a more systematic, in-depth understanding of FSNE services. In this section, we discuss some of the important reasons for conducting this study.

Rapid Expansion in Food Stamp Nutrition Education

Since 1992, FNS has witnessed the rapid proliferation of FSNE and exponential growth in Federal reimbursement for nutrition education activities targeting food stamp-eligible households. In FY 1992, only seven States had utilized the food stamp nutrition education option, with the total Federal cost for this portion of the program at just over \$661,000. By FY 2004, FSNE was provided in 49 States, the District of Columbia, and the Virgin Islands, and the Federal budget was \$228 million. The rapid expansion of FSNE has also increased the need for policymakers within the Administration and Congress to gain information about how public monies are being spent on nutrition education services for the food stamp population and the extent to which important target populations are being reached.

Limited Information on Diversity of FSNE Activities

States have a great deal of discretion in planning and implementing FSNE, resulting in considerable diversity in FSNE services and operations. The breadth of detail that might be of interest to Federal policymakers is not available through existing reporting systems.

Incorporation of Innovative Approaches to FSNE

An evaluation of FSNE was also needed to provide FNS with information about the many new nutrition education approaches that are being used by States. For example, after commissioning a review of

⁵ Anliker, J., Bell, L., Miller, C., Harkins, M., Gabor, V., & Bartlett, L. (2000). *Food Stamp Nutrition Education Study, Final Report*. Washington, DC: Health Systems Research, Inc.

nutrition education research⁶ in 1995, FNS was intrigued by the use of social marketing, a relatively new strategy implemented by the nutrition networks that started in 1995 to deliver nutrition education to food stamp-eligible individuals. FNS also encouraged State agencies to consider other innovative approaches to providing FSNE that used more research-based methods for identifying target populations and delivering messages, while offering ways to reach larger groups of clients.

Lack of Information about Integration of FSNE with Other Federal Nutrition Programs

One of the key components of FNS nutrition education policy is the strong commitment to the coordination of nutrition education messages with other efforts within USDA. Ideally, programs and initiatives such as WIC, EFNEP, and Team Nutrition should be coordinated with the State's effort to deliver nutrition information and messages to the food stamp population. It is also desirable to collaborate with efforts outside USDA, such as programs supported by the U.S. Department of Health and Human Services and the Centers for Disease Control. Increased collaboration and joint planning reduce duplication of efforts and maximize personnel and fiscal resources. FNS needed a national picture of the extent to which collaboration takes place between FSNE and other Federal and State nutrition programs.

Concern About the Effectiveness of FSNE and the Quality of Service Delivery

While FNS is committed to improving the health and well-being of low-income individuals through the provision of quality nutrition education services, available information is limited regarding the overall effectiveness of the program. Increased understanding of FSNE program operations and factors that facilitate or impede service delivery would contribute to the development of measures and tools to assess program outcomes and effectiveness. This study sought to document the extent of evaluation activity, not to measure the effectiveness of FSNE efforts.

Targeting Nutrition Education to Address Issues Important to FNS

Finally, one of the key reasons for conducting a review of FSNE services at the State level is to determine the extent to which current policy-relevant issues are addressed. For example, in response to the obesity epidemic in the United States, FNS has promoted nutrition education efforts directed at obesity prevention in low-income families with children. To assess the extent to which the FY 2004 FSNE Plan Guidance is being implemented, and to promote successful models, FNS needed more detailed information regarding target audiences and educational priorities than was available through the existing reporting system.

⁶ Hersey, J., Matheson, J., Shiveley, L., Bell, L., Harkins, M., & Anderson, S. (1999). *Evaluation of Statewide Nutrition Education Networks*. Alexandria, VA: Health Systems Research, Inc. and The Research Triangle Institute.

Research Questions

The key issues and questions addressed by this study are listed below.

1. Organizational Structure and Planning Process

- What is the organizational structure of FSNE within States?
- To what extent and in what ways is FSNE coordinated, monitored, or otherwise linked to State agencies?
- To what extent and in what ways is FSNE coordinated with other FNS or other Federal and State nutrition education initiatives (e.g., Team Nutrition, Eat Smart/Play Hard, Special Supplemental Nutrition Program for Women, Infants and Children, EFNEP, 5 A Day)?
- To what extent are State FSNE plans implemented as intended?

2. FSNE Delivery

- Who is/are the target audience(s) and what are their primary needs? Who receives FSNE services?
- What is the nutrition content focus of FSNE? What curricula and materials are used in the States?
- To what degree do States rely on different educational delivery strategies or methods? What is the basis for choosing some strategies or methods but not others?
- In what settings are nutrition education activities conducted?
- To what extent do State activities focus on providing information, promoting different attitudes, teaching specific skills, trying out or practicing new behaviors?
- What is the scope of services in terms of the geographic areas covered and demographics of service areas?
- To what extent do FSNE participants recognize the link between nutrition education and the Food Stamp Program?

3. Staff

- What qualifications must FSNE providers meet? What is the nature of training and supervision given to providers?
- What amount of educational services is delivered by professional versus paraprofessional staff without formal nutrition credentials?

4. Record-Keeping, Evaluation, and Assessment

- What kinds of records on FSNE participants and services are kept routinely?
- To what extent and how do States rely on research to make decisions about their FSNE target audience(s), content, and approach?

- Under what circumstances and how often is research typically conducted?
- Do the impact evaluations of State FSNE activity incorporate research designs that support conclusions about cause and effect?

5. Funding

- What is the total dollar value of resources and staff hours directed to FSNE? What is the dollar value of in-kind, cash, and private cash donations that are reimbursable by USDA?
- How are resources allocated across various cost categories?
- How does the value of State resources vary across different sources?
- Based on total FSNE funds, how do the per-capita (recipient and FSNE-eligible) costs vary across States?
- How many States spend more or less than the amount in their FSNE budget, and why?

As the study team developed instruments to collect data for this study, these questions were expanded substantially both in breadth and depth. The responses we received from program staff allowed us to answer many of the key questions. This report presents the answers we obtained as well as the challenges we encountered in addressing some of the questions, which also reflect the current operational characteristics of FSNE.

CHAPTER II. STUDY METHODOLOGY

Multiple data collection methods were used in this study to generate a comprehensive national description of FSNE services along with in-depth, qualitative explanations of key issues of interest to FNS:

- A baseline data abstraction from States' FSNE plan documents for FY 2004,
- A national web-based survey of FSNE representatives from all State agencies with FSNE in FY 2004,
- A national web-based survey of representatives from all implementing agencies that had contracts to provide FSNE in FY 2004, and
- On-site interviews with representatives from a sample of State agencies, implementing agencies, local projects, implementing agency and local project partners, and nutrition educators.

Exhibit 2-1 summarizes the purpose, data sources, and dates of each of these data collection activities.

Exhibit 2-1. Data Collection Methods Used for the FSNE System Review

Data Collection Method	Purpose	Data Sources	Data Collection Dates
FSNE State plan abstraction	To compile baseline information on each State's FSNE plans for FY 2004; to identify site visit sample; to provide background information for site visit data collectors	FY 2004 FSNE State plans from each State	Nov. 2003 – Feb. 2004
Web-based survey	To collect uniform data on FSNE regarding: <ul style="list-style-type: none">– Organizational structure, staff– FSNE administration– Partnerships/coordination– Target audience, needs assessment– FSNE delivery methods– Monitoring and evaluation– Budget and financial management	<ul style="list-style-type: none">– All 93 FY 2004 implementing agencies (84 completed the survey)– 52 State food stamp agencies (50 States completed the survey)	Feb. 2005 – June 2005
Site visits and staff interviews	To collect in-depth explanations of FSNE activities and practices to extend the survey data	Samples of: <ul style="list-style-type: none">– 31 implementing agencies– 27 State agencies– 24 State-level partners– 67 local projects– 43 local partners– 32 local nutrition educators	April 2005 – July 2005

This chapter provides an overview of the study methodology and data collection activities. Detailed descriptions of these data collection activities are provided in Appendix B.

Data Abstraction from States' FSNE Plans for FY 2004

The study team abstracted information from each approved FY 2004 State FSNE plan. The abstracted data were used to: 1) identify implementing agencies for the site visit sampling, and 2) familiarize the site visit data collectors with the characteristics of the sampled agencies before the recruiting process began. In addition, FNS provided State-level data on approved FSNE budget totals for FY 2004 and previous years, and State-level FSNE costs for FY 1997–2004.

Web-Based Surveys

Two web-based, online surveys were conducted for this study, one involving all FSNE implementing agencies and the other involving all State agencies offering FSNE. The following sets of stakeholders were asked to respond to the surveys:

- The State food stamp agency staff person with responsibility for coordination of the single State plan describing FSNE activities and costs,
- Staff from the implementing agencies responsible for the administration of the FSNE plan, and
- Persons involved in the budget development and financial accountability process, from both the State agency and implementing agency.

These stakeholders were asked to provide information that is not obtainable through documents and other publicly available sources, including details about program activities, program management, and expenditure data not typically reported to FNS for FY 2004. The State agency survey consisted of three sections: 1) the State's FSNE organizational structure; 2) FSNE planning, approval, and management processes at the State level; and 3) FSNE financial management at the State level. The implementing agency survey consisted of the following sections: 1) FSNE organizational structure and decision-making process, 2) partnerships and coordination of FSNE, 3) FSNE plan development, 4) target audience and needs assessment, 5) FSNE messages and materials used, 6) FSNE delivery methods, 7) program monitoring and outcome evaluations, 8) FSNE staff descriptions, and 9) FSNE budget and fiscal management. To maximize uniformity in survey administration, the online surveys provided efficient access to definitions of key terms from any location of the survey. Copies of the instruments are included in the *Food Stamp Nutrition Education System Review: Documentation for Public Use Files*.

On-Site FSNE Staff Interviews

The study staff conducted open-ended, in-depth interviews with FSNE officials at the sampled implementing agencies and their State food stamp agency, program partners, local project staff, and local program partners (if applicable). These interviews were conducted to better understand the dynamics of FSNE: why FSNE operates as described in the web-based surveys, how participating agencies plan, implement and manage the program, how they interact with program partners, and how basic program features vary within an implementing agency. Included in the site visits was an examination of how implementing agencies communicate priorities and program instructions to the local projects, the extent to which local projects have flexibility in creating their own programs, the costs associated with local delivery of FSNE, and the relationship between local FSNE providers and other nutrition education

providers. In addition, the site visits provided the opportunity to examine documentation of FSNE staffing, costs, and funding to obtain detailed information that cannot be reliably obtained without face-to-face dialogue.

Sampling of Implementing Agencies for Site Visit Data Collection

The site visit data collection was based on a systematic random sample of implementing agencies designed to represent the diversity of organizational structure, region, and budget nationally. For purposes of this study, an implementing agency was defined as an organization that (1) has an agreement or contract with the State agency (or is the State agency) for the provision of FSNE services; (2) has a separate set of goals, objectives, and outcomes describing how FSNE will be conducted by the implementing agency; and (3) has a separate budget that is approved by the State agency. Implementing agencies may be direct providers of FSNE, may subcontract with local programs or projects for conducting FSNE, or may use a combination of both approaches. The review of State FSNE plans for FY 2004 identified a total of 93 implementing agencies. For the site visit data collection, a sample of these agencies was selected in such a way to appropriately represent the diversity across all implementing agencies.

The review of State nutrition education plans identified three main types of organizations that entered into contracts with a State agency to provide FSNE services: Cooperative Extension Services (CES), nutrition networks, and "other" organizations. Other organizations included State agencies other than the State food stamp agency (e.g., a State department of health), universities, and food banks.

Within the group of CES, two subgroups were identified. One subgroup included agencies that primarily use the traditional CES approach to providing nutrition education, that of providing classes at local locations that follow a prescribed curriculum. The second subgroup combined the traditional approach with nutrition network functions such as Statewide social marketing campaigns and program coordination. We also identified two main subgroups of agencies within the "other" category. One subgroup included agencies that provide their FSNE services themselves, without local projects or subcontracts with other entities. The other subgroup had local projects and/or subcontractors.

Thus, we developed a classification system with five categories of implementing agencies. Exhibit 2-2 shows the number of implementing agencies identified for each category during the review of State FSNE plans.

Exhibit 2-2. Counts of Implementing Agencies, by Type

Type of Implementing Agency	Number of IAs
Cooperative extension without network	39
Cooperative extension with network	10
Independent nutrition network	8
Other independent provider without local projects	22
Other independent provider with local projects	14
Total	93

Note: "IAs" refers to implementing agencies.

The following criteria were used to classify each implementing agency into one of the five categories:

- (1) Cooperative Extension without a Nutrition Network.** The Cooperative Extension Service has a contract with the State to provide FSNE. This category includes all implementing agencies that use the traditional group instruction approach for nutrition education, although they may also do marketing, public education outreach activities, and other activities. These implementing agencies have local projects.
- (2) Cooperative Extension with a Nutrition Network.** The Cooperative Extension Service has a contract with the State to provide FSNE. In addition to the use of the traditional approach, the CES also performs nutrition network functions such as Statewide social marketing and program coordination. The network may serve as a subcontractor of the CES with a separate budget. These implementing agencies have local projects.
- (3) Independent Nutrition Network.** The implementing agency is an independent nutrition network that has a contract with the State to provide FSNE. The CES may be a member of the network but is not the lead organization that is contracted by the State to implement FSNE. The approach to providing FSNE emphasizes strategies that capitalize on the network structure such as social marketing and program coordination. These implementing agencies have local projects.
- (4) Other Independent Providers without Local Projects.** These implementing agencies have contracts with the State, either to provide direct FSNE services or to perform some sort of coordination or recruitment effort. Most deliver services directly, without the use of local projects. In addition, most serve a limited geographic area, such as a city, county, or region. Some of these projects may have multiple sites, such as a county health department, but FSNE is provided in a uniform and consistent manner at each site, and the sites are not independent of the implementing agency. Finally, the State agency itself may be in this category, such as a half-time person who serves in a recruitment and coordination role for FSNE.
- (5) Other Independent Providers with Local Projects.** This category includes implementing agencies, other than CES and networks, which have contracts with the State to provide FSNE services, such as universities. These implementing agencies have local projects. Most often these projects are designed to address the needs of special populations (such as the elderly) or serve a limited geographic area not served by other nutrition education programs. They may be sponsored by State agencies or universities.

Method of Sampling Implementing Agencies

In order to capture the diversity of FSNE nationally based on a sample of implementing agencies, it was important to use a sampling method that ensured selection of appropriate numbers of implementing agencies from each of the five groups. We used a **systematic random sample** in which implementing agencies were first grouped according to type (the five categories). All implementing agencies within a type were then sorted by FNS region, and within region they were sorted by size of budget (by ascending and descending order in alternate regions).⁷

⁷ Sorting by size of budget in this approach helped ensure that the sample exhibited diversity in budget size as well as region and type.

A sampling interval was computed from the number of implementing agencies in the type stratum and the number to be sampled, and a random starting point was selected. Implementing agencies corresponding to the random starting point and every *n*th implementing agency thereafter (where *n* was equal to the sampling interval) were selected.

We had the option of sampling implementing agencies of the five types with equal or unequal probability. We sampled with unequal probability for two reasons. First, FNS was interested in capturing as much diversity in FSNE operations as possible within a fixed resource budget. Second, we believed that there is likely to be less diversity in FSNE operations in some implementing agency types than others. For instance, we expected that, as a group, FSNE operations in “Cooperative Extension without Network” implementing agencies would show less diversity than operations within “Cooperative Extension with Network” or “Independent Nutrition Network” implementing agencies. Thus, to maximize the diversity of FSNE operations in our total sample of implementing agencies, we chose lower sampling rates in strata expected to exhibit less diversity. With an overall sampling rate of 37 percent, the plan **oversampled** implementing agencies in the “Cooperative Extension with Network,” “Independent Nutrition Network” and “Other Independent Provider with Local Projects” types, whereas it **undersampled** implementing agencies in the remaining types. Exhibit 2-3 summarizes the sampling approach.

Exhibit 2-3. Summary of Sampling Plan for Implementing Agencies

	Cooperative Extension without Network	Cooperative Extension with Network	Independent Nutrition Network	Other Independent Provider without Local Projects	Other Independent Provider with Local Projects	Total ^a
Number	39	10	8	22	14	93
Sampling rate	.30	.60	.60	.15	.60	.37
Number of sampled agencies	12	6	5	3	8	34
^a The total sampling rate of 0.37 is calculated as the ratio of sampled agencies to total agencies, 34/93.						

We selected 34 implementing agencies in our sample. The implementing agencies selected are listed in Exhibit 2-4.

Sampling State Food Stamp Agencies for Site Visits

For State agencies to be included in the site visit interviews, we selected the State agencies of the sampled implementing agencies. Because more than one implementing agency was sampled in five states, our site visit sample included 28 State agencies.

Exhibit 2-4. Sample of Implementing Agencies for Site Visits

Name of Implementing Agency	Type of Agency ^a	State	Region
Arizona Department of Health Services	3	Arizona	Western
Family and Consumer Sciences, CES, University of Arkansas	1	Arkansas	Southwest
California Department of Health Services	3	California	Western
Colorado State University	2	Colorado	Mountain Plains
District of Columbia Department of Health	5	District of Columbia	Mid-Atlantic
University of Florida	1	Florida	Southeast
University of Georgia Older Adults	5	Georgia	Southeast
University of Hawaii, College of Tropical Agriculture and Human Resources, CES	1	Hawaii	Western
University of Idaho Extension Nutrition Program	1	Idaho	Western
University of Illinois at Chicago, Division of Community Health	5	Illinois	Midwest
Iowa Nutrition Network; Iowa Department of Public Health	3	Iowa	Mountain Plains
University of Massachusetts	1	Massachusetts	Northeast
Michigan State University Extension	2	Michigan	Midwest
University of Minnesota College of Human Ecology	2	Minnesota	Midwest
Minnesota Chippewa Tribe	5	Minnesota	Midwest
Mississippi Department of Human Services	4	Mississippi	Southeast
Alcorn State University	1	Mississippi	Southeast
Montana State University	1	Montana	Mountain Plains
Department of Nutrition, University of Nevada, Reno	5	Nevada	Western
UNH Cooperative Extension	1	New Hampshire	Northeast
Rutgers, The State University of New Jersey	2	New Jersey	Mid-Atlantic
NY Department of Health	5	New York	Northeast
North Carolina A and T State University	5	North Carolina	Southeast
North Carolina CES	2	North Carolina	Southeast
Ohio State University Extension	1	Ohio	Midwest
University of Oklahoma-Department of Nutrition Sciences in the College of Allied Health	3	Oklahoma	Southwest
Oklahoma State University CES	1	Oklahoma	Southwest
South Dakota State University CES; South Dakota Department of Social Services	2	South Dakota	Mountain Plains
University of Tennessee Health Science Center	3	Tennessee	Southeast
South Plains Food Bank	4	Texas	Southwest
Permian Basin Food Bank	4	Texas	Southwest
West Virginia Department of Health and Human Services (through West Virginia University)	1	West Virginia	Mid-Atlantic
Ho-Chunk Nation	5	Wisconsin	Midwest
University of Wyoming	1	Wyoming	Mountain Plains
^a Type of agency: 1 = Cooperative Extension without Network 2 = Cooperative Extension with Network 3 = Independent Nutrition Network 4 = Other Independent Provider without Local Projects 5 = Other Independent Provider with Local Projects n/a = not available based on the review of FY 2004 State FSNE plans.			

Sampling Local Projects for Site Visits

Local projects were purposively selected to reflect the diversity of nutrition education efforts being carried out at the local level. The most important dimension of diversity depended on the type of implementing agency and other features of the FSNE plan. For traditional CES agencies, we expected that the most diversity was in whether the local project serves an urban, rural, or mixed area. Other

relevant dimensions included method of delivery (e.g., direct education, indirect education, and social marketing), demographics of the target audience, and FSNE goals and objectives.

Prior to recruiting each of the sampled implementing agencies, the study team reviewed the abstracted State plan data from each sampled implementing agency and prepared a list of three to seven local projects that exhibited diversity in nutrition education efforts. Then, in consultation with the implementing agency director, we selected two to seven local projects for site visit interviews that would capture the full range of projects within that agency.

Sampling Partner Organizations for Site Visits

Implementing agency partners were selected for interviews based upon information contained in the State's FSNE plan. The principle criterion for selection of the program partner was the expected level of involvement of the partner as described in the State plan and the relative proximity in distance to where the implementing agency was located for site visit logistical efficiency.

Local project partners were identified when we recruited the selected local projects and scheduled their site visits. At that time we ascertained whether they had any partnering agencies for provision of FSNE and, if so, who those partnering agencies were. If the local project had more than one partnering agency, we selected one for an interview based on the level of involvement of the partners in providing FSNE, as reported by the local project.

Final Survey and Site Visit Interview Samples

Survey Response Rates. For the web-based survey, the final response rates were as follows: 84 (90 percent) of 93 implementing agencies and 50 (96 percent) of 52 State agencies responded to the survey.

Site Visit Interview Samples. Altogether, the following numbers of FSNE agencies and partners participated in site visit interviews: 31 implementing agencies, 27 State agencies, 24 State-level partners, 67 local agencies, 43 local partners, and 32 nutrition educators.⁸

Site Visit Interview Instruments and Schedule

Six interview protocols were used during the on-site data collection:

- Interview Guide for State Agency
- Interview Guide for FSNE Implementing Agency
- Interview Guide for Implementing Agency Partner
- Interview Guide for Local Project or Subcontractor
- Interview Guide for Local Project/Subcontractor Partner

⁸ Although the original study sample consisted of 34 implementing agencies and 29 State food stamp agencies, the final site visit sample included 31 implementing agencies and 27 State agencies. The reasons for these changes are described in Appendix B: Methodological Appendix. Some of the 32 nutrition educator interviews involved two or more persons collectively providing information to complete an interview protocol. Thus, 32 protocols were completed by approximately 50 nutrition educators.

- Interview with Nutrition Educators at Local Agencies

Copies of these instruments are included in the *Food Stamp Nutrition Education System Review: Documentation for Public Use Files*.

The site visits began one month after the implementation of the web-based surveys so that the site visit interviews could explore in greater detail the FSNE operational issues based on information obtained from the survey. The interviewers were instructed in the data collector training regarding specific survey data to extract and review for the States and implementing agencies that they visited as part of the preparation for each site visit.

Multiple State-level staff were interviewed, along with multiple staff at local projects. In addition, because coordination with other nutrition education efforts directed at low-income families is so important to FNS, the project team interviewed a sample of public and private partners, State FSP officials, directors of other FNS-sponsored nutrition education programs (such as WIC or Team Nutrition), and representatives of nutrition education projects funded by the U.S. Department of Health and Human Services (HHS) or the Centers for Disease Control and Prevention (CDC).

Generally, when only one implementing agency within a State was sampled, a two-person team spent three days on-site. In states with two implementing agencies sampled, the site visits could take as many as five days.

Limitations of Study Data

In presenting the findings from this study, it is important to describe several challenges that we encountered in data collection and analysis that may have influenced the quality of data and that constrained the scope of data analysis. The main issues regarding the quality of data are summarized below and also discussed further in Appendix B: Methodological Appendix.

Self-Report Data. Except for data abstracted from State FSNE plans or obtained from FNS reports, all data collected for this study were reported by staff in agencies and organizations providing FSNE services. There was no way to assess the extent of possible bias in the data provided by study respondents.

Response Rates. The overall survey response rates were quite high. At the individual item level, both surveys had very low levels of missing data, except for the financial data sections. However, the item-level response rates for interview question were lower largely due to the great diversity among FSNE organizations and staff, resulting in many questions that were not applicable.

Definitions of Key Terms. In reviewing the survey responses and interviewing FSNE program staff, it became clear that respondents used varying definitions of several terms used in this study. For example, what some implementing agencies described as “needs assessment” did not fit the standard definition, based on FSNE Plan Guidance, as a method to determine both the target population for FSNE and their specific nutritional needs. Varying definitions presented challenges even though we included easy access to an online glossary for the web-based surveys and the site visit data collectors were thoroughly trained to help the interview respondents understand the meaning of our questions.

Different Interpretations and Applicability of Questions Depending on Respondents. Beyond the varying definition of terms, respondents also interpreted our questions and issues being addressed in somewhat different ways. For example, in identifying sources of funds, there was some confusion among implementing agencies that were part of a Cooperative Extension Service based in a State university. Some respondents viewed funds from other parts of the university as being “implementation agency” funds, while others made a distinction between their own funds and other university funds. Reasons for these varying interpretations seemed to reflect the variations in FSNE organizational types and structures, service delivery contexts, and prior experience with FSNE.

Variations in Program Record Keeping Systems. Many of the questions in the web-based surveys and the site visits required program staff to provide a wide range of descriptive data such as characteristics of program participants, participation rates, staffing, and expenditures. In FY 2004, State and local FSNE agencies did not collect, manage, nor report these types of data using a standardized format, data management system, or schedule. Agencies varied greatly in how these data were organized and reported for their purposes, and some agencies’ data were not compatible with the way we intended to collect the data. As we explain in more detail in Chapter VII, this problem became a major constraint in conducting financial analysis of FSNE operations.

Data Analysis and Reporting

Data collected for this study were analyzed by: 1) quantitative analysis (e.g., frequencies and percentages) of web-based survey data, 2) qualitative analysis of interview data, and 3) integrative, interpretive analysis of results from all types of analysis to address this study’s research questions. The following set of guidelines were applied in our data analysis and reporting to make the maximal use of the data collected while ensuring the accuracy of the findings and conclusions we report.

Extent of Subgroup Analysis

With the data collected by the survey and on-site interviews, we had planned to examine key aspects of FSNE implementation according to various subgroups of FSNE agencies (e.g., different types of organizations that serve as implementing agencies, various characteristics of these organizations, target audience characteristics, presence or absence of local projects or subcontractors, types of educational services implemented). However, in our quantitative and qualitative analyses, we discovered that the possibility of subgroup analyses was extremely limited for the following reasons:

1. Potential subgrouping factors often overlapped (e.g., Cooperative Extension agencies with a network, Cooperative Extension agencies without a network, and non-Cooperative Extension Service agencies that have a network). While the categories of implementing agencies used for sampling served that purpose, they did not represent operationally distinct subgroups of FSNE agencies.
2. Further, even with the census survey of implementing agencies, the number of respondents was small. In analyses of the implementing agency survey data with a total of 84 records, the number of agencies in each of the five types of agencies was relatively small, making the comparisons of responses across these subgroups unreliable.

3. Another strategy was to combine the implementing agencies into fewer, larger groups (e.g., all Cooperative Extension Services vs. non-CES). If we combined all Cooperative Extension agencies regardless of presence or absence of nutrition network, we may have masked potential differences due to networks. If we combined all implementing agencies that had a nutrition network, we may have grouped agencies that are quite different in attributes other than having a network. When we attempted such combinations, analyses did not reveal clear differences, likely due to the substantial diversity among agencies that were grouped together for the analysis.
4. For some measures that could have been used for creating subgroups (e.g., dominant types of educational services implemented, dominant target groups), we were concerned about the reliability, given the definitional issues that may have affected the accuracy of these data.

Thus, we report only the subgroup analyses that were based on clearly definable grouping variables, with a reasonable number of respondents in each subgroup.

Integration of Survey and Interview Data Analysis

For each major topic of analysis, we began by examining quantitative analysis results of survey data. While these analyses provided percentages of various response categories, conceptually they represented a broad-brush profile of an aspect of FSNE implementation. We then went to the open-ended interview data to flesh out in greater detail the general profile obtained from the survey data analysis. The interview data, for example, informed us about “how” and “why” certain decisions were made. Thus, the focus of our interview data analysis was to capture qualitative, descriptive information as “examples” of interesting or innovative practices, rather than to present nationally generalizable frequencies of specific types of responses. This report is structured to incorporate the quantitative and qualitative analysis results into an integrated presentation.

Findings from the survey data analyses are presented in terms of percentages of State agencies and implementing agencies associated with specific responses. Based on the survey response rates of 96 and 90 percent, respectively, the survey results can be interpreted as close representation of all State agencies and implementing agencies.

For the interview data, the original intent in conducting a systematic sampling of implementing agencies was to capture information as representative as possible of the diversity among implementing agencies nationwide. However, largely due to the very lengthy interview protocol, and possibly reflecting the great diversity, there were substantial levels of nonresponse for many interview questions. While the implementing agency sample included 31 systematically sampled agencies, the number of respondents for many questions was 20 or fewer, a marked deviation from the systematic sample frame. Further, the interview samples of State agencies and local stakeholders were not based on systematic sampling. These interviews also involved substantial levels of nonresponse. Thus, while in some cases, we report percentages for interview analysis results, these percentages should not be interpreted as representing the entire FSNE nationally.

Time Reference for the Description of FSNE

The objective of the study was to generate a national description of FSNE services. To ensure the consistency of responses and to capture the FSNE activities for a complete annual cycle, the entire data

collection was framed by asking respondents to describe their FSNE plans, services, and outcomes for FY 2004. To maintain consistency in reporting, we describe our findings in the past tense, referring to FSNE in FY 2004. However, in some programs, major changes took place between FY 2004 and FY 2005, and such changes are noted in this report.

CHAPTER III. ORGANIZATIONAL STRUCTURE, ROLES, AND RESPONSIBILITIES

This chapter describes the structure of food stamp nutrition education, and briefly highlights the roles and responsibilities of its primary stakeholders, namely:

- State food stamp agencies (State agencies),
- Implementing agencies, including nutrition networks,
- Local projects, subcontractors, and nutrition educators,
- FSNE partners at the State and local level, and
- Local food stamp offices.

The subsequent chapters present more detailed information on roles and responsibilities of each stakeholder in FSNE activities, including plan development, selection of target audience, needs assessments, message selection, funding decisions, FSNE delivery, staff training, and FSNE monitoring.

CHAPTER HIGHLIGHTS

- The FSNE structure is multilayered and includes the State food stamp agency, implementing agency, local projects, subcontractors, nutrition educators, and partners at both the State and local levels.
- Sixty percent of State food stamp agencies contracted with one and 28 percent contracted with two implementing agencies to deliver nutrition education.
- Just over half of the implementing agencies are Cooperative Extension Services of a land grant university (55 percent).
- Approximately one-third of implementing agencies reported using a nutrition network as part of their FSNE management structure.
- Seventy-seven percent of implementing agencies delivered FSNE through local projects or subcontractors.
- Approximately one-third of implementing agencies reported having established an outside advisory committee as part of their administrative structure (see Appendix A, Chapter III Additional Exhibits, Exhibit A3-7).
- Where State food stamp agencies were actively involved in FSNE, they were most likely to be involved in the selection of the target audience and funding decisions (28 percent) related to the implementing agencies.
- Local partners were typically programs that provided access to a low-income audience for nutrition education.
- Local food stamp office involvement primarily focused on distribution of materials and providing referrals.

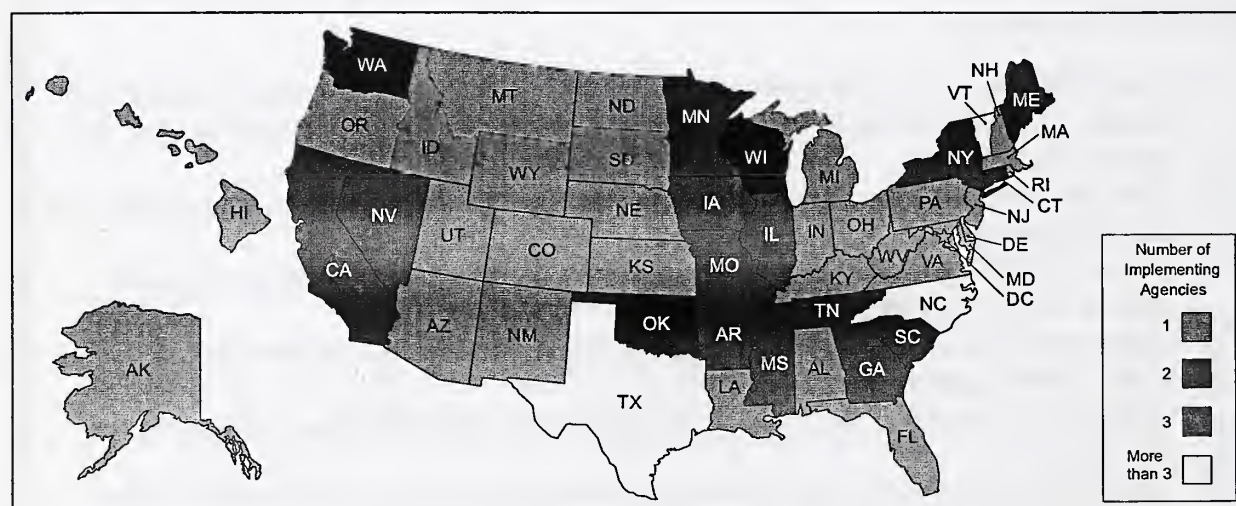
State Food Stamp Agency

Structure of State Food Stamp Agencies in FSNE

The State food stamp agency has the option of providing nutrition education to food stamp recipients as part of their Food Stamp Program operations. It is responsible for all Food Stamp Nutrition Education (FSNE) activities that occur within a State as outlined in an approved State FSNE plan.

As described in Chapter I, all State agencies contract with other organizations to deliver all or part of FSNE, and for purposes of this review are named “implementing agencies.” In FY 2004, most State agencies contracted with either one implementing agency (60 percent) or two implementing agencies (28 percent) (Exhibit 3-1 and A3-1⁹). Three States (Wisconsin, Oklahoma, and Washington State) had three implementing agencies, Vermont had five implementing agencies, and North Carolina and Texas each had six implementing agencies (Exhibit A3-2).

Exhibit 3-1. Map of Number of Food Stamp Nutrition Education Implementing Agencies per State



Source: State Agency Survey

⁹ Exhibits numbered with the letter A are located in the Appendix of this report.

There was variation in the number of implementing agencies by region, with a high of 16 agencies in the Southeast to a low of seven agencies in the Mid-Atlantic (Exhibit 3-2).

Exhibit 3-2. Number of Implementing Agencies per Region

Region	Number of Implementing Agencies	Percent of Implementing Agencies
Mid-Atlantic	7	9%
Midwest	10	13
Mt. Plains	12	15
Northeast	10	13
Southeast	16	20
Southwest	13	16
Western	12	15

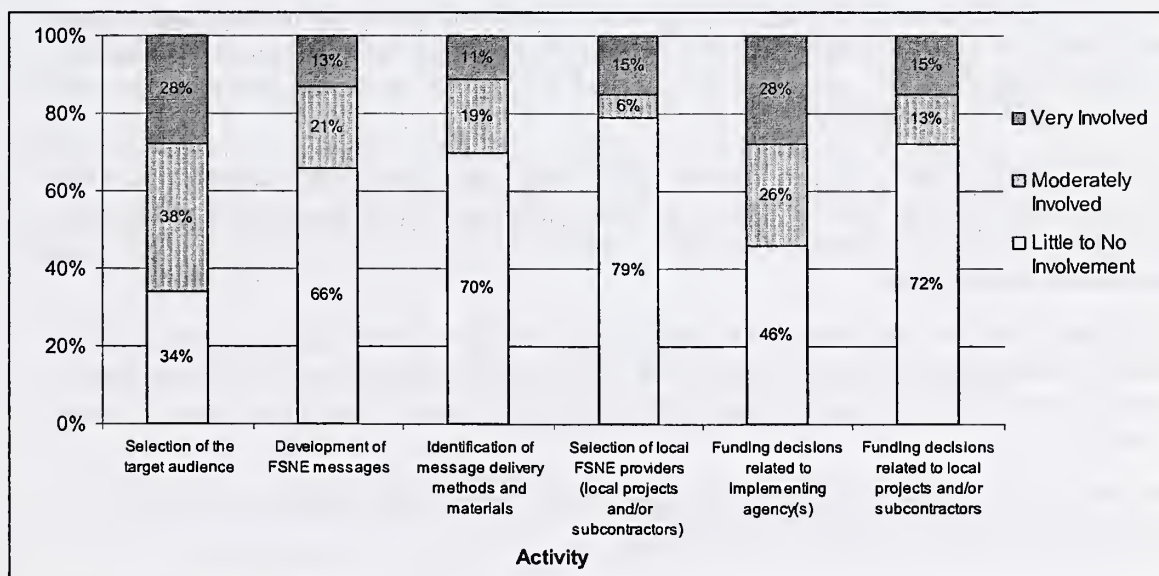
Number of Respondents: 80

Source: *Implementing Agency Survey*

Role of State Food Stamp Agencies

The role of State agencies varied widely depending on the activity. Although 28 percent were very involved in the selection of the target audience and in funding decisions related to implementing agencies, far fewer were very involved in message development (13 percent), identification of delivery methods or materials (11 percent), funding decisions related to local projects (15 percent), or selection of local projects (15 percent) (Exhibit 3-3).

Exhibit 3-3. State Agencies' Level of Involvement in Various FSNE Activities



Number of Respondents: 47

Source: *State Agency Survey*

Examples of funding decisions in which the State food stamp agency was involved include decisions on allowability of costs, appropriateness of expenditures,¹⁰ and, in some cases, local project funding. In interviews with officials in State agencies that were very involved in funding decisions, most of the involvement came in the form of reviewing budgets and expenditures in the context of FNS allowability guidelines. In a few cases, State officials reported denying funding to an implementing agency for some FSNE activity that they did not believe would be allowed by FNS. In other cases, funds were not approved for activities that might have involved expenditures in an area not allowed by the State, such as out-of-State travel. In one State where interviews were conducted, the State food stamp agency denied ongoing funding to a local project with a history of not providing adequate documentation for expenditures.

The State agency was also usually involved in discussions between the FNS Regional Office and the implementing agencies. The State agency often helped resolve issues related to plan approval, and was regularly included in communication between the regional office and the implementing agency.

State agencies' activity level varied depending on the type of implementing agency. While on average, 63 percent of State agencies characterized their involvement with the FNS Regional Office with regard to FSNE plan approval as "very active," they were more likely to be very active with the local public health departments, emergency food providers, or tribal programs. They seemed to be somewhat less active when the implementing agency was a university (such as a Cooperative Extension agency) or State agency (such as a State Department of Aging) (Exhibit A3-3).

The States included in the site visits provided further insight into the role of the State agency. While this was only a sample of 28 State agencies in FY 2004, involvement could be broadly categorized into four main areas:

1. The State agency had very little involvement. It reviewed and approved the budget and plan, and then passed it to the FNS Regional Office. It was included in any issues that may have arisen during plan approval, but mainly as a pass-through. *Forty-four percent of State agencies visited were included in this category.*
2. The State agency was involved in the planning process, but once the plan was approved, it was the responsibility of the subcontractor to fulfill its obligations. The State agency was actively engaged in resolving problems with the plan. *Thirty-three percent of State agencies visited were included in this category.*
3. The State agency was very involved in the planning of goals and activities, monitoring, and financial management. Decision-making took place in a collaborative manner, with the State agency actively participating. *Eighteen percent of State agencies visited were included in this category.*
4. The State agency made FSNE decisions at the State and local levels. *Five percent of State agencies visited were included in this category.*

¹⁰ Allowable costs are distinguished from appropriate expenditures by the level of discretion FNS officials have in approving their inclusion in a budget. Allowable costs are a specific list of those cost elements that can be included in any FSNE budget (such as salaries and wages) and those which are specifically prohibited (such as client transportation); while appropriate costs are based on the judgment of FNS officials as to whether or not the costs are necessary for a particular project or activity.

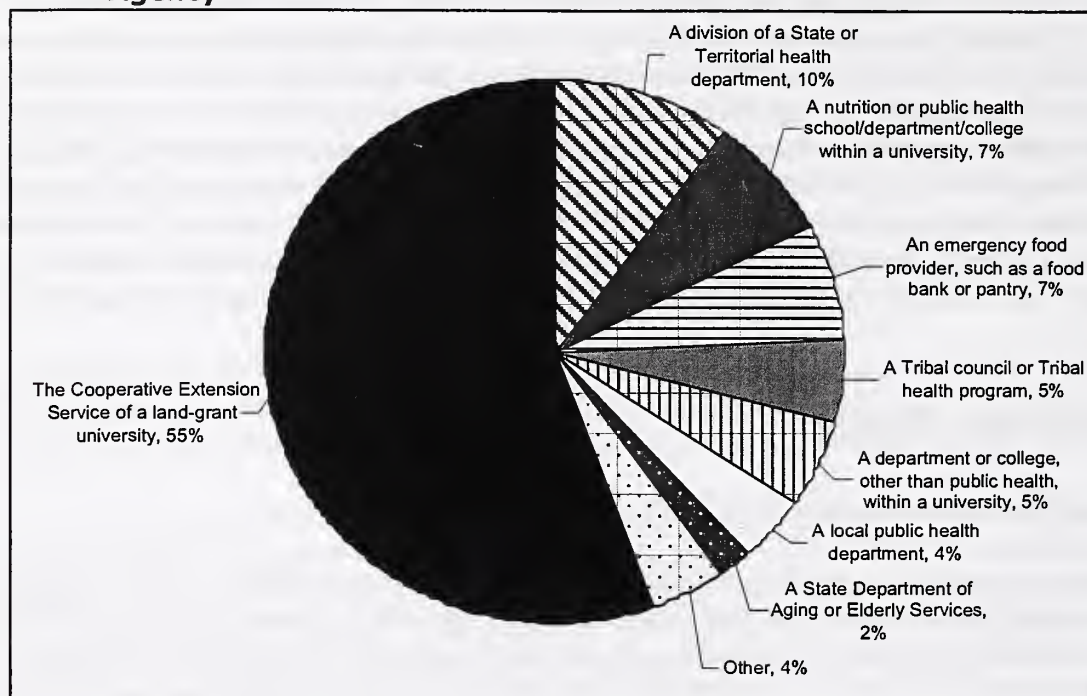
State agencies expressed an interest in becoming more involved with FSNE, but felt challenged by the additional time required to do so. They also believed that FSNE needed to be implemented by experts in nutrition, and they did not feel that they had the expertise to be involved in message development or delivery. Typically, State agencies reported that if they had additional resources, they would want an expanded role in monitoring to ensure that the program was meeting its intended goals. Some State agencies, such as Vermont, Nevada, Florida, and Mississippi, have dedicated more resources to FSNE over the last few years, and are more active in its planning, implementation, and monitoring than years prior. Nevada provides a good example of the changing role of the State food stamp office. At the end of 2004, the State hired a nutritionist to take the lead in FSNE development for the State. The nutritionist will now take the lead in conducting all needs assessment activities in the State, conduct outreach campaigns, work to identify additional resources, and participate in implementing agency monitoring activities.

Implementing Agency

Structure of Implementing Agencies in FSNE

State food stamp agencies contracted with various types of organizations to deliver nutrition education. Just over half (55 percent) of implementing agencies were a Cooperative Extension Service (CES) of a land-grant university. However, the remaining 45 percent represented a wide range of organizations, including divisions of a State or Territorial health department (10 percent), a nutrition or public health school/department/college within a university (7 percent), and emergency food providers such as a food bank or pantry (7 percent) (Exhibit 3-4). The appendix lists all implementing agencies, their State, region and type (Exhibit A3-3).

Exhibit 3-4. Type of Organization that Best Describes the FSNE Implementing Agency



Number of Respondents: 83

Source: *Implementing Agency Survey*

Role of Implementing Agency

The implementing agency was the lead decision maker in almost all activities. It specified interventions in keeping with the goals and objectives for FSNE, made funding decisions related to local projects and overall allocation of resources, trained nutrition educators, and conducted monitoring and evaluation to ensure that FSNE was implemented as intended. While most implementing agencies had local projects and/or subcontractors provide direct and indirect education, they themselves implemented social marketing campaigns. If affiliated with a university, the implementing agency was more likely to conduct research projects that supplemented the work of the local projects/subcontractors such as in the case of the Michigan State University Cooperative Extension or the University of Minnesota, College of Human Ecology.

For implementing agencies without local projects or subcontractors, the implementing agency took on the added responsibility of providing direct and indirect education.

While later chapters will discuss how implementing agencies made their decisions regarding planning, implementation and evaluation, it is important to note that there were few significant associations between type of implementing agency and how FSNE was delivered including methods, messages, and target audience. When there were such associations based on type of implementing agency, they were duly noted throughout this report.

Nutrition Networks

The nutrition network is a specific coordinating mechanism of the FSNE implementing agency. At times the network is an independent subcontractor, or “implementing agency,” to the State agency, and at other times it is a mechanism used within the structure of another implementing agency.

The structure of the nutrition networks has changed somewhat since being established by FNS in 1995–96 through a series of cooperative agreements to States. Initially, 21 States submitted applications and were funded to develop nutrition networks. The purpose of the nutrition networks was to:

- Better coordinate the delivery of FSNE among public and private nutrition education providers within their State,
- Develop a new approach to the delivery of FSNE through using social marketing techniques, and
- Develop ongoing systems to reinforce nutrition education messages across multiple FNS-funded programs.

The initial nutrition networks differed from traditional FSNE implementing agencies in that they were encouraged to develop a strong governance feature using individuals from multiple nutrition education providers as “network partners.” Network partners differed from traditional advisory committees in that they were encouraged to participate in the network’s governance and decision-making process with regard to the planning and implementation of FSNE.

After the initial funding of nutrition networks, it was expected by FNS that the networks would sustain their existence through normal FSNE funding. Beyond the initial requirements set forth in the cooperative agreements, there was no specific long-term guidance provided for the structure, organization, and functioning of nutrition networks, so this study examined what had become of the original networks and which, if any, other States had developed a nutrition network.

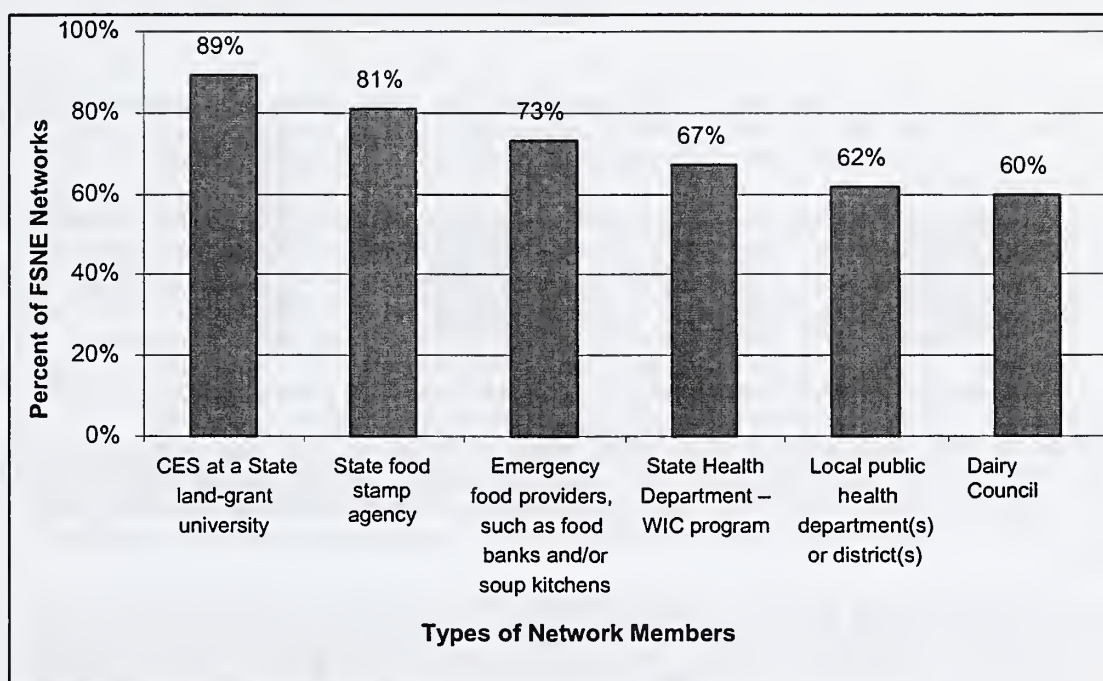
In FY 2004, 27 implementing agencies (33 percent) reported either being a nutrition network or having a nutrition network as part of their organizational structure.¹¹ Of these, however, most were not the independent entities that were initially funded through the cooperative agreements. Of the States reporting having a nutrition network, 67 percent stated that the network was a part of a larger FSNE initiative. Only five agencies indicated that they were contracted by the State food stamp agency as a nutrition network independent of other FSNE activities similar to the ones initially funded through the cooperative agreements (Exhibit A3-5). However, when it comes to the budgetary impact of nutrition networks, including the California network, on FSNE, these same five agencies (which were built around the initial FNS cooperative agreement funding) represent over half of the FSNE expenditures in the country. The diversity in structure and roles is illustrated in the examples below:

¹¹ Agencies were asked to self-report if their organization included a nutrition network. In some cases, the implementing agency itself was a nutrition network, such as in California, while in other cases an implementing agency such as a Cooperative Extension had a nutrition network as a part of its organization, but was treated organizationally in a manner similar to that of a local project (e.g., Washington State).

Structure	Role
<p>Arizona. The Arizona nutrition network is an initiative of the State Dept. of Public Health. It is contracted directly by the State food stamp agency to provide FSNE. It is the only implementing agency in the State. It subcontracts with a variety of organizations to provide direct education. It also leads in the development and implementation of a Statewide social marketing campaign. The subcontractors are responsible for identifying their non-Federal contribution.</p>	<p>The Arizona nutrition network developed a Statewide social marketing campaign. They regularly held focus groups with the target population and forums with the network members to get feedback on message development. The subcontractors provided direct nutrition education and supplemented their activities with the network's campaign materials and curricula.</p>
<p>Michigan. The Michigan nutrition network is a part of Michigan State University, Cooperative Extension Service's contract with the State food stamp agency. Michigan State also implements direct nutrition education through its local cooperative extension offices. They are the only implementing agency in Michigan.</p>	<p>The Michigan nutrition network members serve as proposal reviewers for subcontractors who want to participate in FSNE. The network provided nine subcontractors with "enhancement grants" that built upon their existing nutrition activities. The network held yearly meetings where each subcontractor presented their program and the evaluation results of their program. No Statewide social marketing campaign existed.</p>
<p>North Carolina. In FY 2004, the State food stamp agency held contracts with six implementing agencies. The North Carolina nutrition network was responsible for coordinating the development of all FSNE activities conducted by all of the other implementing agencies in the State, as well as conducting its own social marketing campaign.</p>	<p>The North Carolina nutrition network was given the responsibility to conduct trainings for all other potential implementing agencies, develop standards and criteria for planning guidance, review all plans being submitted to the State agency, and help with monitoring the progress of other implementing agencies. In addition, the nutrition network carried out its own social marketing project to reinforce a common message in targeted counties, and subcontracted with two local providers for direct nutrition education delivery.</p>

The nutrition networks developed partnership agreements with various State government, local government, and nonprofit agencies. The State agencies most often represented in these networks were the State food stamp agency, CES, and the WIC program within the State Health Department (Exhibit 3-5). The local agencies most often represented in nutrition networks were food banks, local public health departments, and local school districts. Forty-six percent of nutrition networks reported that local food stamp offices were members of their network. The local TANF or welfare office was a member of 15 percent of the networks.

Exhibit 3-5. Types of Nutrition Network Members



Number of Respondents ranged from 23–27.

Source: *Implementing Agency Survey*

Statewide nonprofit, trade, and advocacy organizations also participated in the networks. Among these categories, the Dairy Council was most often a member (60 percent); the Meat Industry Trade Association (32 percent) and the State or local dietetic association (30 percent) were the next most frequently reported members. In general, fewer networks reported advocacy organizations as members. Of those that did include advocacy organizations, the most frequently reported were the State WIC association (30 percent) and food stamp outreach (30 percent) or other types of hunger prevention alliances (Exhibit A3-6).

Among the eleven nutrition networks selected for site visits, the number of network members ranged from 15 members in New Jersey to more than 200 network members in California.

The California Nutrition Network: A Significant Contributor to the National Picture of FSNE

In order to put the national picture of FSNE into perspective, it is important to note the role of the California nutrition network and its unique contribution to FSNE. The California nutrition network, which is sponsored by the California Department of Health, is the largest implementing agency in the country with an approved budget over ten times the size of the next largest implementing agency. Approximately 40 percent of all FSNE funds for State food stamp nutrition education go towards nutrition network activities. In FY 2004 the California nutrition network funded over 200 subcontractors, as well as large-scale social marketing campaigns and a network of eleven regional nutrition networks. The network also coordinates activities with other Statewide projects, including 5-A-Day and California Project Lean.

The California nutrition network supported a diverse group of FSNE providers, among which were local public health departments, county social service agencies, food security organizations, faith-based organizations, tribal programs, parks and recreation districts, Healthy Cities and Communities, Cooperative Extension offices, universities and colleges, and cancer research centers. In addition, the network supports social marketing activities using both paid and unpaid media to promote healthy eating in major media markets throughout California.

The large number of local projects, Statewide activities, and regional initiatives require a significant amount of program coordination. California nutrition network central and regional office staff were responsible for examining funding proposals and ensuring that coordination between appropriate programs and agencies was built into the project prior to it receiving approval. As a result, programs were funded that were both unique and innovative in approach and yet well coordinated with other Statewide nutrition education efforts.

In addition, the California nutrition network had a strong evaluation team that both conducted needs assessment activities as well as examined process and outcome measures. The evaluation team used a variety of methods to collect data with the goal of ensuring that initiatives were consistent with the needs of the State, were well coordinated, and were administered effectively.

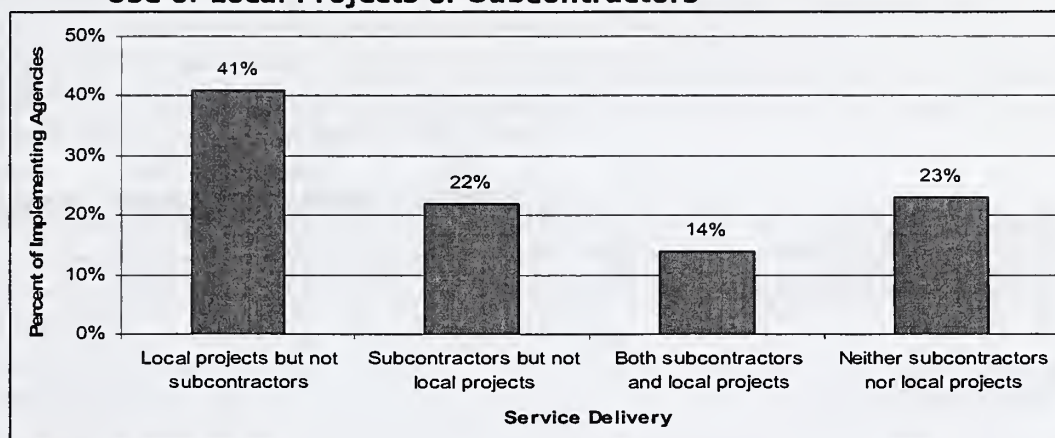
Local Projects and Subcontractors

Structure of Local Projects and Subcontractors in FSNE

Chapter I described the distinction between local projects and subcontractors, namely that local projects are essentially an arm of the implementing agency, providing FSNE in a specific community. Subcontractors, on the other hand, are independent entities with a formal agreement to implement FSNE within the context of their existing initiatives such as a county health department or community action agency that is implementing a specific project funded by the implementing agency. This difference has implications in delivery and monitoring.

Approximately 77 percent of implementing agencies used local projects (41 percent), subcontractors (22 percent), or both (14 percent) to deliver some or all of FSNE services (Exhibit 3-6).

Exhibit 3-6. Percent of Implementing Agencies that Deliver Services Through the Use of Local Projects or Subcontractors



Number of Respondents: 83

Source: *Implementing Agency Survey*

The choice to use local projects, subcontractors or neither was associated with the type of implementing agency. In the case of CES, most used the county extension offices to deliver FSNE (Exhibit 3-7). During site visits, CES agencies described that they utilized this system because the county offices were familiar with the needs of their community and could work in tandem with other initiatives in the office or with local partnering agencies. Because the local offices were a part of the CES, the infrastructure was similar throughout the implementing agency, and administrative and staff requirements as well as training were relatively uniform across the implementing agency's FSNE initiative.

State or Territorial health departments, on the other hand, were more likely to use subcontractors to deliver FSNE (88 percent). Those who did not use local projects or subcontractors delivered services themselves and were usually serving a small number of communities, such as the Corpus Christi Food Bank, or had nutrition educators based at the central office that traveled throughout the State, such as the University of Georgia – Older Adults Program.

Exhibit 3-7. Use of Local Projects and Subcontractors for FSNE Delivery by Type of Implementing Agency

Type of Implementing Agency:	N	Used Only Local Projects	Used Only Sub- contractors	Used Both	Used Neither Local Projects nor Sub- contractors
		Percent			
The CES of a land-grant university	46	65%	7%	13%	15%
A division of a State or Territorial health department	8	12	88	0	0 ¹²
A nutrition or public health school/department/college within a university	6	0	50	17	33
An emergency food provider, such as a food bank or pantry	7	14	14	0	71
A Tribal council or Tribal health program	4	25	25	25	25
A department or college, other than public health, within a university	4	0	25	75	0
A local public health department	3	33	33	0	33
A State Department of Aging or Elderly Services	2	0	50	0	50
Other	3	0	0	33	67
Number of Respondents	83	34	18	12	19

Note: Percents total 100 in each row.

Source: *Implementing Agency Survey*

If implementing agencies used local projects, the average number used was 30, with over 50 percent using more than 13 local projects (Exhibit 3-8). There was a wide range on the number of local projects, from one to 223.

Exhibit 3-8. Percent of Implementing Agencies by Number of Local Projects

Number of Local Projects	Percent of Implementing Agencies
1–6 Local Projects	27%
7–12 Local Projects	22
13–36 Local Projects	24
37+ Local Projects	27

Number of Respondents: 45

Source: *Implementing Agency Survey*

In total, 28 implementing agencies reported using subcontractors. The average number used was 18.5, much lower than the average number of local projects used. There also was a wide range in the number

¹² All activities are conducted at the implementing agency level

of subcontractors used; from one subcontractor to a maximum of 204. Over half used four or fewer subcontractors (Exhibit 3-9).

While the number of local projects and subcontractors per implementing agency are of interest to give a general sense of the structure at the local level, its magnitude does not necessarily equate to the proportion of budget or workload.

Exhibit 3-9. Percent of Implementing Agencies by Number of Subcontractors

	Percent of Implementing Agencies
1–6 Subcontractors	66%
7–12 Subcontractors	7
13–36 Subcontractors	17
37+ Subcontractors	10

Number of Respondents: 29

Source: *Implementing Agency Survey*

Subcontractors also varied in type. While detailed information on all types of subcontractors used by each implementing agency is not available, there is information on the subcontractors used in the 28 States visited—recognizing that the selection of subcontractors to visit was not random. County health departments were the type of subcontractor most often visited (30 percent). There were almost equal visits made to Native American Tribes, school systems, universities, food banks, and other community and health and social services.

At the level of the local project/subcontractor, there was usually a director or coordinator who was responsible for FSNE and other nutrition-related activities in their agency. For the county extension offices, this meant that the local FSNE Director may also be the local Expanded Food and Nutrition Education Program (EFNEP) Director, or report to the extension agent responsible for other nutrition and food programs. For the county health departments, the FSNE Director often oversaw programs such as WIC, diabetes programs, and cardiovascular health.¹³

Role of Local Projects and Subcontractors

Seventy-one percent of local projects and subcontractors interviewed believed that they and their staff made most of the decisions about the local implementation and delivery of FSNE services, while one-third of local projects indicated that their implementing agencies were responsible for decision-making, (these responses were not mutually exclusive). The majority of local projects and subcontractors received guidance from the implementing agency based on the FY 2004 FSNE Plan Guidance regarding target population, core nutritional messages, and acceptable methods of delivery. They then felt they had the autonomy to make decisions that would be most beneficial to their community.

¹³ FSNE directors were often not full-time positions, and the salaries for these individuals usually were composed of funding from multiple programs for which they had responsibility.

Local projects contributed to recruiting and selecting local partners, identifying the target audience, and developing content of nutrition education services. According to local project interviews, they talked with local nutrition education collaborators about the number of sites where FSNE services would be offered, the number of participants to plan for, and the number of staff and other resources available for FSNE. Local projects also conducted marketing campaigns and outreach to secure new partner agencies and new sources of FSNE matching funds.

In general, the choice of whom to subcontract with was determined by two primary factors. The first was whether the subcontractor was well-equipped to provide nutrition education in their community, including understanding the needs of their target audience. The second was whether the subcontractor could provide the non-Federal contribution.

The level of autonomy varied depending on whether the agency was a local project and therefore an office of the implementing agency, or a subcontractor. The local project was much more likely to follow a specific set of goals and curricula identified by the implementing agency and based on FSNE plan guidance regarding key topic areas listed above. Subcontractors, on the other hand, while provided guidance by the implementing agency, had more flexibility to identify messages and methods. Regardless of the structure, materials and techniques had to be approved by the implementing agency.

Nutrition Educators

Nutrition educators are an important stakeholder in the delivery of direct education. Without exception, implementing agencies relied on nutrition educators to provide direct education to clients. This was regardless of whether the educators were staff of the local project/subcontractor or the implementing agency office.

Nutrition educators were often the face of FSNE in the community. In the planning stage, they usually found, or helped to find, partner agencies. They also maintained partnerships from the previous year. During implementation, they worked with the partners and FSNE clients to decide what nutritional topics to cover and then adapt curricula and materials to meet the needs of their clients. They also were the primary deliverers of nutrition education, especially teaching nutrition education classes. Nutrition educators were responsible for keeping their own records, reporting pre/post tests and the number of participants served, and documenting non-Federal contributions from partner agencies.

FSNE Partners

The nature of partnerships in FSNE was very diverse. For purposes of discussion, we describe partnerships both at the implementing agency and local levels. At the implementing agency level there were often “advisory partners,” who provided input on policy decisions or helped establish coordinating mechanisms. These partners provided input through a *formal agreement*, or as a part of a *working group or committee*, both of which are described below. The nutrition network partners provided another mechanism for coordination.

The use of a committee or working group as part of FSNE planning and implementation was reported by one-third of implementing agencies. Among the 26 implementing agencies with an outside advisory

committee, the most commonly cited organizations were State CES and State and/or local health departments (73 percent and 69 percent, respectively) (Exhibit A3-7). The State WIC Agency, State Department of Education, Agency on Aging or Bureau of the Elderly, and emergency food providers each were cited in this role by close to half of the respondents with outside advisory committees. Faith-based service providers and food industry and distribution organizations were less commonly reported as outside advisory committee members.

Three-quarters (73 percent) of implementing agencies either had a formal partnership(s) or reported that FSNE was "well-coordinated" with at least one USDA initiative or program, such as WIC, the National School Lunch Program, or Team Nutrition. Almost 40 percent of implementing agencies had formal partnerships with other nutrition education efforts in their State for coordinating FSNE activities.

The extent of collaboration with partners did not vary across different types of implementing agencies. Similarly, the type of implementing agency did not seem to influence the type of USDA initiatives with which they collaborated (Exhibit A3-8 and A3-9).

There were a few instances where the members of the outside committee varied between nutrition networks and other implementing agencies, namely that networks seemed slightly more likely to have food banks, soup kitchens, food pantries ($p=.07$), faith-based service provider(s) ($p=.06$), and nonprofit health-related organization(s) (e.g., American Cancer Society, American Heart-Association) ($p=.02$). There were no significant differences in the types of agencies that nutrition networks had as formal partners versus other implementing agencies.

At the local level, partners were somewhat different from implementing agency level partnerships. Local partners typically provided access at their sites to low-income audiences for nutrition education. Local partners either operated independently in the community (e.g., a school district, a local food bank) or were a local office of a larger State initiative (e.g., a local WIC office, a Head Start site). In other cases, local partners were associated with TANF-related job training, family education, or self-sufficiency projects, which provided space and clients for a local FSNE project.

Here, as at the implementing agency level, the roles of the local partners varied widely. In some locations, the nutrition educator used the office space of a partnering agency, like a county health department, and then conducted FSNE entirely independently of the partnering agency. In other locations, the partner was intimately involved in making decisions such as which nutrition education topics were to be covered with their audience, which times were most convenient to hold FSNE classes, and even whether to co-teach classes.

At the implementing agency level, the partners often provided guidance or shared information through coordination attempts, while at the local level, partners were more instrumental in funding decisions, because they were likely to be one of the sources of non-Federal funds. For example, a local partner might be contributing a certain amount of in-kind contributions to the local project, such as space or staff, and were hence more likely to be involved in the local project's overall development of funding priorities. For example, a local project, such as a local Cooperative Extension office, might conduct FSNE activities at a site that provides job training to TANF recipients. In this case, the agency providing the job training is a local partner, and the in-kind cost of space, materials, and even some staffing may be used by the local project as a non-Federal in-kind contribution. In this case, the partner would also likely be involved in the overall decision-making process of the local project as to funding priorities and how the total budget for the project might be implemented.

Local Food Stamp Offices

Local food stamp offices are the primary providers of benefits under the Food Stamp Program. However, until the release of the FSNE Guiding Principles by FNS in September 2005, there was not a clearly defined role for local food stamp offices in the provision of nutrition education.

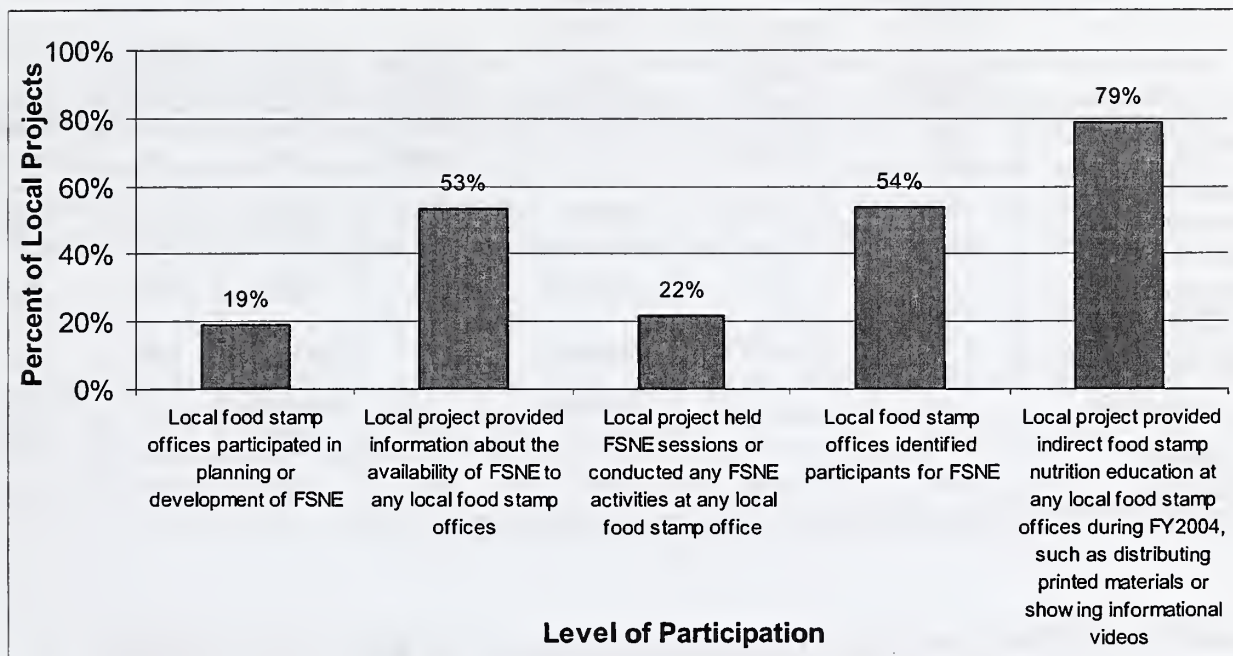
According to interviews with State food stamp agency officials in States where local food stamp offices were involved in FSNE, these offices played an important role. Local food stamp offices helped with FSNE implementation through providing data for needs assessment, assisting implementing agencies with identifying food stamp participants, distributing materials, and providing referrals. However, even in States where local food stamp offices participated in FSNE, there was little evidence that any formally defined role had been developed either by the State food stamp agency or by the implementing agency.

According to local projects and subcontractors interviewed, only 19 percent of the local food stamp offices were involved in FSNE planning or implementation. They were much more likely to be involved in distributing nutrition education brochures and materials (Exhibit 3-10).

From the perspective of the local FSNE project or subcontractor, there were multiple reasons for the local food stamp offices' lack of involvement in planning or implementation. The most significant barrier was that local food stamp offices were usually understaffed and had little or no personnel resources or physical space to direct towards nutrition education. Another barrier to providing nutrition education at the food stamp office, or providing information and referrals to where one could participate in a nutrition education class, was the nature of the food stamp office activities. In some States, such as Florida, local food stamp offices were gradually closing as they moved to using more Internet-based application. Even where local offices were not closing, the client was spending less time in the office, and the nature of the benefits did not require regular office visits. Local projects also reported that local food stamp offices felt that clients were coming to the office to receive their benefit, rather than receive nutrition education, and were most likely not interested in participating in education at that point in time.

The relatively low level of involvement in planning and implementation of nutrition education by food stamp offices was consistent across types of local projects/subcontractors and implementing agencies. However, in some States, there were strong efforts made by both the implementing agency and the State food stamp agency to involve local food stamp offices. For example, the Arizona nutrition network and the State food stamp agency piloted an "Adopt a Food Stamp Office" project. The purpose was for subcontractors to make a concerted effort to recruit food stamp recipients by providing education within the food stamp office along with materials and training. As is typical with pilot projects, they met with mixed success. The network feels that the subcontractors probably needed more specific guidance on activities to conduct within the food stamp office, which they will be doing in the coming year. In Mississippi, officials reported a very strong overall relationship with their local food stamp offices – they received lists of FSP participants and conducted a variety of classes at the local food stamp offices, including food and nutrition, budgeting, and parenting.

Exhibit 3-10. Local Food Stamp Office Participation from the Perspective of Local Projects/Subcontractors



Number of Respondents: 68

Source: Local Projects/Subcontractors Interviews

Summary

There are numerous stakeholders in the implementation of food stamp nutrition education and the role of these stakeholders varied depending on the activity.

In summary, the exhibit below provides a snapshot of the level of involvement of the various stakeholders (Exhibit 3-11). In general, the implementing agencies and local projects and subcontractors were highly involved in the selection of the target audience and the conduct of the needs assessment. The State agency played a more minor role, and for the most part local food stamp agencies played little to no role. Partners at the implementing agency level played a somewhat different role than partners at the local level. At the implementing agency level, the partners often provided guidance or shared information through coordination attempts, while at the local level, partners were more instrumental in funding decisions, because they were likely to be one of the sources of non-Federal funding.

Finally, it must be understood that FSNE organizational structures and provider/partner relationships can be multilayered and complex. Minnesota provides an example of the multilayered, multistakeholder FSNE structure and the level of organizational complexity that can be developed in FSNE planning and delivery. The Minnesota Human Services agency contracted with two FSNE implementing agencies: the University of Minnesota, College of Human Ecology (U of M) and the Minnesota Chippewa Tribe (MCT). While U of M worked through their local extension offices (i.e., local projects) to deliver FSNE, the MCT subcontracted with five Bands of the Chippewa Tribe, including the Fond du Lac Band.

Exhibit 3-11. Likelihood of Stakeholder Involvement in FSNE Activities

	Coordinate with FNS and/or Regional Office	Select Target Audience, Needs Assessment	FSNE Message Selection and/or Development	FSNE Funding Decisions	FSNE Education Delivery	FSNE Staff Training	Monitoring
State Agency	High	Moderate	Low	Moderate	Low	Low	Moderate
Implementing Agency	High	High	High	High	High	High	High
Local Projects/Subcontractors	Low	High	Moderate	High	High	High	High
Implementing Agency Partners	Low	Moderate	Moderate	Low	Moderate	Low	Low
Local Partners	Low	Moderate	Moderate-Low	Low-High	Moderate-Low	Low	Moderate-Low
Local FS Agencies	Low	Low	Low	Low	Low	Low	Low

Source: Implementing Agency and State Food Stamp Agency Web-based Surveys

The Public Health Unit in the Fond du Lac Band of the Chippewa Tribe hired a part-time Nutrition Educator Assistant (NEA) to educate food bank recipients and other low-income tribal members about nutritional health. The NEA employed various educational techniques, including classes, one-on-one meetings, presentations, and cooking demonstrations. The NEA received guidance from registered dietitians, nutritionists in the tribal health clinic, and the WIC program to ensure that the information she provided was science-based and met the needs of her target population. Public health nurses, WIC, and food distribution sites all referred clients to the NEA for one-on-one intensive counseling. The NEA also partnered with schools on reservations where she conducted classes with youth. The Public Health Director saw the role of the NEA as providing additional nutritional support and specifically helping the Native population learn how to stretch their dollars and increase their food security.

The Minnesota Chippewa Tribe, acting as the FSNE implementing agency, was responsible for overall coordination, financial reporting to the State agency, training, and plan development. They relied upon U of M in the development of their FSNE model. U of M identified four core nutritional areas and 26 corresponding messages and approved curricula. It was then the choice of the local nutrition educators and the director to tailor the curricula to meet the specific needs of the community. U of M provided technical assistance, training, curricula, and monitoring forms to the Minnesota Chippewa Tribe. The implementing agencies worked together to ensure consistent messages and coordination of services.

Both implementing agencies collaborated with partners on the local level to deliver FSNE to organizations such as Head Start, food distribution sites, and schools that serve economically challenged populations. At Fond du Lac, FSNE was an integrated part of the nutrition and health education system for Tribal members. The program partners were, in essence, a part of the program management.

The State agency had somewhat limited involvement in FSNE. There was neither sufficient time nor enough staff members to allow extensive involvement. However, the State agency was readily available to assist the implementing agencies in addressing budget issues. For example, in FY 2004, there were significant issues with calculating State cost share. The State agency was proactive in working with the

FNS Regional Office to get the issues resolved. The State agency believed that the implementing agencies were the experts in nutrition programs and trusted them to deliver high-quality, effective programs.

At the end of FY 2004 and the beginning of FY 2005, the State legislature required the State food stamp agency's Public Health and Children's Division to create a Health and Nutrition Committee to identify ways to improve coordination and collaboration. The State agency decided it wanted to take a larger role in FSNE and the committee assisted them in doing so. As a result, the complexity of the overall system continues to grow. This example demonstrates how successful collaboration can be accomplished through well-structured and cooperative arrangements among multiple stakeholders.

CHAPTER IV. FSNE PLANNING

State agencies are required to submit a "FSNE plan" to receive Federal reimbursement for 50 percent of the cost of nutrition education activities that they provide to FSP recipients and eligibles. Each State plan must describe:

- The FSNE goals and objectives,
- Target audience and needs assessment to identify the target audiences' nutritional needs,
- Services and activities to be implemented,
- Planned interagency coordination to maximize the efficiency of service delivery,
- Plans to conduct implementation process and outcome/impact evaluations of FSNE services,
- Staffing plans to support the delivery of nutrition education, and
- The budget to carry out the planned services.

This chapter describes the FSNE planning process for FY 2004 focusing on the following key issues:

- Overview of FSNE planning process,
- Needs assessment,
- Identification of target audience,
- Development or selection of nutrition education message and curriculum, and
- Budget planning.

CHAPTER HIGHLIGHTS

- A majority (72 percent) of the implementing agencies conducted needs assessments to determine the target populations that they would serve, primarily using existing data provided by the State food stamp agencies. Needs assessment focused primarily on identifying target audiences, and less on determining their nutritional needs.
- Nearly three-quarters of State agencies indicated that they asked implementing agencies to make food stamp recipients and applicants a high priority but allowed implementing agencies to target broader low-income populations. The majority (52 percent) of implementing agencies targeted the low-income population at or below 185 percent of the poverty level.
- In FY 2004, 71 percent of implementing agencies indicated that they tested some or all of their educational messages through methods such as focus groups and interviews with food stamp recipients or other low-income audiences. Another common practice in selecting educational messages and curricula was to use the materials that were useful in previous years.
- FSNE budget development in FY 2004 was conducted primarily by the implementing agencies and their local projects/subcontractors. About half of the local projects reported encountering problems during budget development and receiving assistance from their implementing agencies on issues such as allowable costs and what qualifies for non-Federal FSNE funds. About one-quarter of implementing agencies denied funding to local projects or subcontractors, commonly due to insufficient non-Federal funds.
- Only 8 percent of State agencies denied funding to an organization that applied to be an implementing agency.
- Most implementing agencies (88 percent) implemented their FSNE plans fully or mostly as intended.

Overview of FSNE Planning Process

The basic steps involved in FSNE plan development are: 1) the implementing agency develops a plan, independently or together with local projects or subcontractors; 2) the State agency reviews the plan and works with the implementing agency to refine it; and 3) the State agency submits a single State FSNE plan to the FNS Regional Office for approval, as requested in the FSNE Plan Guidance.

Implementing agencies are at the center of the planning process. State agency interviews indicated that participation in FSNE was usually initiated by the implementing agencies submitting plans to the State agency. Only 14 percent of the State agencies interviewed indicated that they issued a request for proposals in FY 2004, and only 27 percent had a policy limiting the number of implementing agencies in the State.

Among the implementing agencies that had local projects or subcontractors (roughly three-quarters of all implementing agencies), at least 62 percent conducted the FSNE planning process in collaboration with their local agencies (Exhibit A4-1). The implementing agencies defined the goals and objectives of the program, translated FNS guidelines into the context of their organization's mission and services, trained local projects on how to develop their plan, reviewed local projects' budgets and plans, and compiled the overall budget for the agency.

About two-thirds of local projects interviewed received technical assistance from their implementing agencies regarding issues such as: FSNE plan requirements, budget development, how to set up an accounting system, FSNE staffing decisions, needs assessment, and selecting or developing educational materials. Almost all local projects interviewed reported that this type of assistance was helpful.

Local projects took an active role in recruiting local partners, identifying the target audience, and developing nutrition education activities (Exhibit A4-2). Local projects worked with local partners to determine locations where nutrition education activities would take place, staff and other resources that would be available for FSNE, and potential sources of non-Federal funds for FSNE. For about 60 percent of local projects interviewed, their input in FSNE plan development ended with submission of their plans to implementing agencies. But, the remaining 40 percent stated that they participated in State-level FSNE steering committee meetings and provided review and feedback on the development of a Statewide program.

In implementing agencies with no local projects, and in 38 percent of implementing agencies with local projects, the agency staff executed the entire planning process. In over half of the implementing agencies, an internal steering committee of implementing agency staff was involved in planning. However, outside advisory committees did not have much input in the FSNE plan development at the implementing agency level.

At the State agency, the program director (e.g., the Director of the Office of Human Services, the Director of the Department of Family Services, the State food stamp agency director) or FSNE coordinator generally handled the tasks related to the FSNE plan. Typically, when implementing agencies submitted their plans, the State agency reviewed the plan against the FY 2004 FSNE Plan Guidance (e.g., checking whether the budget items were allowable). If the implementing agency plan needed clarification or changes, the State agency requested meetings and conference calls to obtain additional information from implementing agencies.

In states with multiple implementing agencies, the State agency is responsible for consolidating separate plans into one State plan. Among 24 State agencies that had multiple implementing agencies in FY 2004, half reported some involvement in coordinating FSNE planning among the implementing agencies (Exhibit A4-3). However, the interviews with State agency staff indicated that the extent of consolidation varied across States. In some States with more than one implementing agency, one of the implementing agencies was tasked to consolidate separate plans into a State plan. One State that had two implementing agencies submitted separate implementing agency plans as Part A and Part B of the State plan without any integration.

Overall, a majority (77 percent) of the implementing agencies interviewed characterized the State agency as being “effective” in their role in FSNE planning and none thought the State agency was “not effective” (Exhibit A4-4).

Needs Assessment Process

The State FSNE plan should be based on a needs assessment to identify the nutrition needs of the FSP recipients and eligible population in the targeted community. Specifically, the FY 2004 FSNE Plan Guidance states that a needs assessment is used to: (a) identify target audience (based on factors such as food stamp status, other demographic characteristics, and geography); (b) identify the nutrition needs of the target audience; and (c) identify any language/education level needs of the target audience. A complete needs assessment includes formative research to select promising nutrition education methods and messages for the specific target audience identified and is intended to increase the likelihood that FSNE services reach the target audience who are in need of the services and whose dietary practices can be expected to improve as a result of the educational intervention.

One of the incongruities of this study was how implementing agencies and local projects treated the notion of needs assessment. In the survey, many implementing agencies reported that they conducted needs assessments to identify the populations with the greatest nutritional needs and the specific nutritional needs of the clients. However, when asked to describe their needs assessment process during site visits, most agencies described processes that were used for identifying and locating low-income audiences, but not actually assessing the nutritional needs of specific target groups. More often than not, a curriculum was in place that covered a multitude of nutrition topics, and was used with all of the target audience members. Even in agencies with more targeted messages, such as promotion of fresh fruits and vegetables, there was often an assumption that all low-income audiences needed to increase consumption, and a FSNE-specific needs assessment in this area was not conducted. One reason cited for the lack of in-depth nutritional needs assessment was the limited resources for FSNE planning and research.

Needs Assessment Conducted in FY 2004

Most implementing agencies surveyed (72 percent) reported that they conducted needs assessments to identify the populations with the greatest nutritional needs and the specific nutritional needs of the clients. Such assessments were conducted primarily by the implementing agencies (37 percent) or jointly by implementing agencies and local projects (17 percent). However, given that a majority of implementing agencies (69 percent) reported that their FY 2004 plans changed little or none from the previous year, these agencies’ plans may have been based on previous years’ needs assessment.

As recommended by the FY 2004 FSNE Plan Guidance, a majority of implementing agencies used existing data as the primary basis for needs assessment. The implementing agencies surveyed reported that they requested State food stamp agencies to provide Food Stamp Program data, including Statewide participation data, county-level data on the number of participants and/or participation rates, or data on the demographic characteristics of participants (61 percent, 55 percent, and 45 percent, respectively) (Exhibit A4-5). In addition, State agencies provided information on locations of Food Stamp Program offices and diversity of languages in various Food Stamp Program areas.

In the interviews, implementing agency staff described additional types of data sources they used for the FY 2004 needs analysis such as: Ohio Hunger Report from Children's Hunger Alliance in Ohio; data and reports from the Centers for Disease Control and Prevention, National Institutes of Health, U.S. Department of Health and Human Resources, U.S. Department of Labor, State health departments, and State education departments; and information from local nutrition networks and county cooperative agents.

Decisions about Geographic Coverage

To determine the geographic areas where FSNE services would be provided, implementing agencies used existing data such as census, unemployment, and health indicator data in addition to the FSP participant demographic data. In addition to identifying areas with high concentrations of FSP recipients or low-income populations, availability of resources needed to implement the planned services was another major consideration (e.g., local project personnel who would write grant applications and run the program; partner organizations with appropriate expertise, facilities, or funding potential). Decisions regarding FSNE service areas also reflected the local projects' existing service areas.

Some potential service areas were restricted, even though local agencies were interested and local populations needed nutrition education. In these cases, the decisions to limit the scope of service coverage were due to scarcity of staff resources, bilingual staff, and organizational capacity; lack of available local funds; or remoteness of the areas. Ways in which budget and financial issues have affected the scope of FSNE programs and services are discussed in Chapter V.

Involvement of State Agencies and Local Food Stamp Offices in Needs Assessment

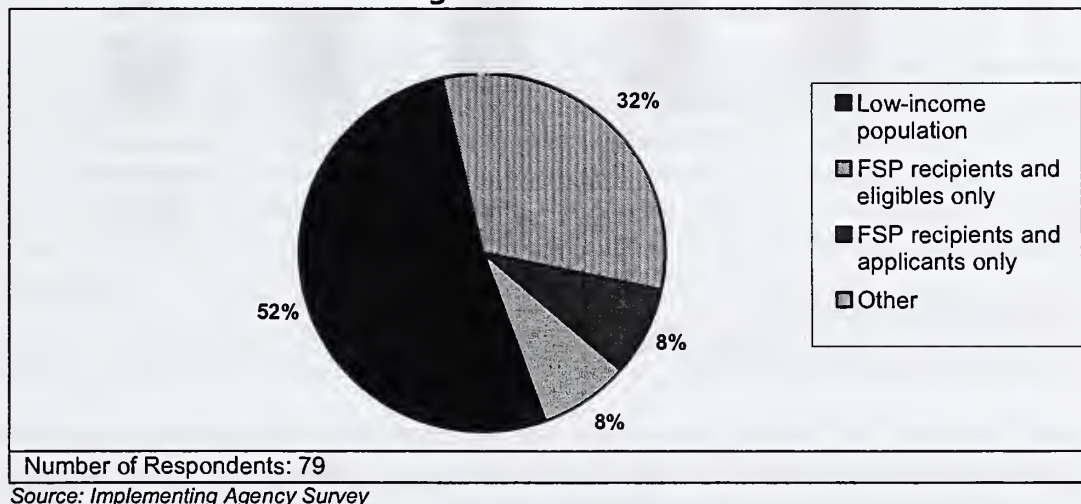
Only 16 percent of State agencies surveyed reported that they were actively involved in FSNE needs assessment beyond the provision of FSP participant data (Exhibit A4-6). Most State agencies interviewed reported that they felt that needs assessment conducted by the implementing agencies was effective in identifying the needs of food stamp recipients. A few examples of greater State involvement included the following: one State agency encouraged its implementing agencies to include the homeless population as a target audience. Another State agency provided information about the types of nutrition education services that were appropriate for various groups of food stamp recipients. A small proportion of the implementing agencies (20 percent) reported that local food stamp offices were also involved in the design or implementation of the needs assessment process.

Defining Target Audiences

Information about needs assessment collected in this study focused on identifying a specific target audience for FSNE services (rather than their nutritional needs), and the "target" commonly described

generally extended beyond the FSP recipients or eligibles. The majority (52 percent) of implementing agencies surveyed targeted the low-income population with household income up to 185 percent of poverty as their primary audience in FY 2004 (Exhibit 4-1). Slightly less than one-third of the agencies targeted FSP recipients and eligibles (household income at or below 130 percent of poverty). Just 8 percent targeted only FSP recipients and applicants.¹⁴

Exhibit 4-1. General Audience Targeted for FSNE in FY 2004

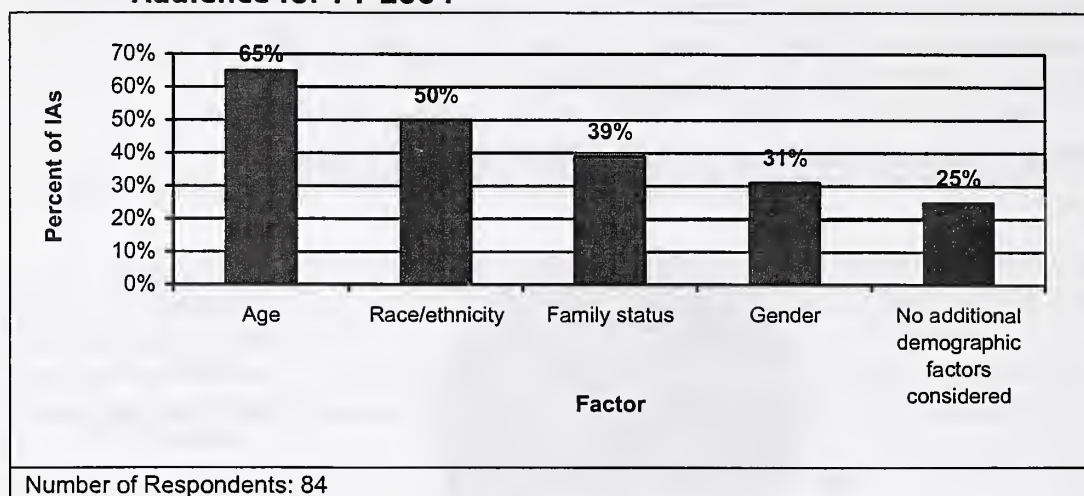


Nearly three-quarters of State agencies surveyed indicated that they asked implementing agencies to make food stamp recipients and applicants a high priority but allowed implementing agencies to target broader low-income populations (Exhibit A4-7). Only one State agency required implementing agencies to serve only food stamp recipients and applicants.

The majority of implementing agencies used demographic factors other than income in defining the target audience for FSNE. Age was the most common factor (65 percent of implementing agencies), followed by race and ethnicity (50 percent) and family status (i.e., whether households have children, 39 percent) (Exhibit 4-2).

¹⁴ The implementing agencies targeting “other” income groups generally reported a variation of the targeting of low-income households with income below 185 percent of poverty, such as targeting schools with 50 percent or more of students approved for free or reduced-price school meals. Some of these agencies reported targeting groups with at least 50 percent food stamp recipients or eligibles.

Exhibit 4-2. Additional Demographic Factors Considered in Determining Target Audience for FY 2004



Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

The local projects interviewed planned to target: low-income families (31 percent of local projects), elementary school children (24 percent), elderly individuals (16 percent), and children in preschools and middle schools (15 percent each). Only 14 percent of local projects interviewed said they targeted only food stamp recipients or food stamp eligible individuals.

Reasons for Selecting Specific Target Audiences

In interviews, implementing agency directors were asked why the agencies selected each of the target audiences in their plans. Most of the implementing agencies could describe the sources of needs assessment data but were less clear on explaining *why* they selected specific target audiences. A director in **Georgia** explained that they based their decision to target the elderly on data from the Department of Human Resources, Division on Aging, showing that over 50 percent of their clients were low-income (below 185 percent of poverty). They also chose to target senior centers because of the availability and needs of this population; the University of Georgia's existing relationship with senior centers and regional agencies, which assured access and the availability of matching funds; and the University's ongoing research on nutritional needs of the elderly. This agency also consulted with nutrition educators, senior center directors, and regional Wellness Coordinators; and used the USDA/HHS Dietary Guidelines, Healthy People 2010 guidelines, and the National Institute on Aging guidelines to determine the elderly individuals' need for physical activity.

In **North Carolina**, the implementing agency's Network/Social Marketing campaign involved an in-depth needs assessment in 1995 and identified low-income women between 35-55 years of age as their FSNE target population because they were most likely to make behavior changes and generally make food decisions for their family.

Arizona's implementing agency decided to target school children because they felt that children would be an effective way to reach adults.

Additional Issues Considered in Selecting a Target Audience

Identification of specific cultural/ethnic groups as a planned target audience was based on Census data, language spoken by food stamp recipients, demographic data from partner agencies, and local staff input. In addition, factors such as accessibility and expected responsiveness of potential target groups were considered as well as groups who are the focus of ongoing research or existing services of the implementing agencies.

Some implementing agencies interviewed (e.g., Arizona, Idaho, Illinois, Massachusetts, Mississippi, Montana, West Virginia, and Wyoming) explained that they coordinated the selection of their target audience with other programs such as EFNEP, WIC, Head Start, Team Nutrition, and nutritional programs for the elderly.¹⁵ They stated that the goals of such coordination were to provide consistent messages to shared target populations, to complement respective roles such as provision of educational materials and direct education delivery, and to receive FSNE participant referrals from other nutrition education agencies.

Challenges to Targeting Food Stamp Recipients

The implementing agencies interviewed explained the challenges of targeting food stamp recipients for FSNE, including perceived barriers and stigma about receiving food stamps and the difficulty of getting people to reveal their food stamp status. In Texas, the inability to definitively identify food stamp recipients led the State food stamp agency to drop many food banks from its FSNE plan for FY 2005. In sparsely populated rural areas, such as in Minnesota, food stamp recipients are scattered geographically, and coupled with a lack of public transportation, programs had a hard time collecting a critical mass of participants.

Selection of Nutrition Education Curriculum and Topics

According to the FY 2004 FSNE Plan Guidance, the content of FSNE services must be science-based nutrition education intervention that is focused on: 1) health promotion for participants by increasing healthy eating habits and physically active lifestyles, and 2) primary prevention of diseases through healthy diets and physical activities. The FY 2004 FSNE Plan Guidance points to the Dietary Guidelines for Americans as the foundation of educational services in all FNS nutrition assistance programs.¹⁶ Within this basic framework, the FSNE plans need to articulate specific educational messages and delivery methods that stress the importance of dietary quality and are appropriate for the target audience selected.

The survey and interview responses referred to the process of “message development” broadly, typically referring to “selection” and “use” of certain educational topics and curricula, rather than the “development” of educational messages in a strict sense. Thus, the discussion in this section generally describes the “message selection” process, beginning with who is responsible for the selection.

¹⁵ The primary program is the Elderly Nutrition Program of the Administration on Aging, Department of Health and Human Services. USDA provides commodity assistance to this program.

¹⁶ For FY 2004, the FSNE Plan Guidance referenced *Nutrition and Your Health: Dietary Guidelines for Americans, Fifth Edition*, U.S. Departments of Agriculture and Human Services, Washington, D.C., 2000. The Sixth Edition was published in 2005.

Agencies Involved in Curriculum Selection

The State agency's role in message and curriculum selection was generally limited to the approval of the proposed educational materials and approach. Two exceptions identified in interviews were: the New York State agency formed a work group to generate ideas for message development for the State's "Eat Smart New York!" campaign, and the New Hampshire State agency helped the implementing agency to design a brochure targeted to homeless families.

There was considerable variation in the relative contribution of implementing agencies and local projects in the curriculum and message selection. Some implementing agencies interviewed indicated that they counted on local projects to play a major role in the plan process because their local projects "know" who the target audience should be, where they are, and how to present the nutrition education messages to them most effectively. These agencies held frequent discussions (e.g., bi-monthly conference calls) with local projects to discuss the local input as they shaped the FSNE plans together. Other implementing agencies, on the other hand, controlled most of the planning decisions regarding the curriculum selection and targeted messages with little or no input from the local projects.

Message and Curriculum Selection

In FY 2004, 71 percent of implementing agencies surveyed indicated that they tested some or all of their educational messages (Exhibit A4-8). In message testing, focus groups with food stamp recipients or with other low-income audiences were the most often-reported type of formative research used (43 and 52 percent, respectively) (Exhibit 4-3). Other methods, such as interviews or surveys with food stamp recipients, review of other formative research, or reviews by peer nutrition educators were each conducted by approximately one-third of implementing agencies.

Exhibit 4-3. Methods Used by Implementing Agencies to Test Messages

Type of Message Testing	Percent of IAs
Focus groups with other low-income audiences	52%
Focus groups with food stamp recipients	43
Survey of food stamp recipients	39
Pilot study of curriculum	37
Peer educator review	37
Review of other State agency formative research with similar populations	35
Interviews with food stamp recipients	33
Testing the quality of translations of materials in a language other than English	24
Other	17
Number of Respondents: 54	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Web-based Survey*

In addition to these formative research activities, methods used for message and curriculum selection were diverse. A common practice was to use the messages and curricula that had been used in the past. For example, the staff might have mastered a curriculum focused on increasing consumption of fruits and vegetables and other dietary messages. Such implementing agencies tended not to deviate from the messages included in that curriculum. In terms of matching the education message to a specific target audience, some agencies identified a menu of "approved" messages (26 in New Jersey for example) with

corresponding curricula that local projects and subcontractors could use. It was the responsibility of the local projects and nutrition educators to choose from the menu of messages the ones most appropriate for any given class or student.

Examples of Diversity in Message Development

In **Arizona**, the implementing agency (State health department) used the four core elements of FSNE as the foundation for message development, focusing on dietary quality and food safety. The agency first developed a logic model, adding the outcomes emphasized by FNS, then mapped the results of a qualitative needs assessment onto the logic model to shape the overall content and message of the program. The messages were basically the same regardless of target audience, while the delivery approach was tailored to accommodate different target audiences.

In **Minnesota**, the local projects worked with local partner agencies to determine what participants need to know and what they are ready to learn about food and nutrition. In **Illinois**, an implementing agency used research findings from Center for Disease Control and NIH studies to determine the nutrition education needs of their target audiences and educational services appropriate for them. In **Idaho**, the implementing agency asked their clients what they would like to learn about and built lessons around those topics.

In **Georgia's** implementing agency targeting the elderly, nutrition educators identified whole grains as a priority because they had not been addressed before, and because of the impact on medical problems of the elderly. In addition, information from research-based sources, including the Dietary Guidelines, led to the program's emphasis on food safety and physical activity promotion. These messages were developed in previous years through input from State, regional, and local agencies serving seniors. Interventions were designed to address gaps in nutrition knowledge and behavior identified through assessments of seniors when they enrolled at senior centers.

Budget Development

In order to obtain FNS approval, proposed FSNE budgets were required to include detailed information to show that planned activities were allowable, planned expenditures were reasonable and necessary, and that allowable non-Federal funding for 50 percent of expenses would be provided. In the budget development, implementing agencies and local projects juggled multiple, interrelated issues, including the FSNE requirement regarding target audience, coordination with partners to recruit participants appropriate for FSNE, and securing sufficient and acceptable sources of non-Federal funds.

If the implementing agency proposed to serve audiences that were not just food stamp recipients and applicants, they had to obtain a waiver from this requirement. This had to be considered if the projects or their potential partners that served low-income populations did not have data on the incomes or food stamp receipt of the population to be served. Further, any sources of non-Federal funds could not be designated concurrently as the non-Federal funds required for another Federal program. Implementing agencies, and local projects working with local offices of other agencies, reported that it was sometimes difficult to determine whether a particular combination met these requirements. Some implementing

agencies incorporated nonpublic sources of funds, while others believed that potential partnerships would not be allowed because they involved use of private funds (e.g., churches).

FSNE budget development activities in FY 2004 were conducted primarily by the implementing agencies and their local projects/subcontractors. Nearly two-thirds of implementing agencies that had local projects or subcontractors provided a budget format that was used by the local projects or subcontractors to prepare their own budgets (63 percent). The remaining one-third indicated that the implementing agency prepared budgets for local projects/subcontractors (36 percent).

In general, the budget development process at the local level involved decisions regarding staff salaries, project hours, sources and amount of Federal funds needed, and selection of partners. About half of the local projects interviewed reported encountering problems during the process of budget development. The problems cited included: securing sufficient non-Federal funds, determining how to include private contributions, definitions of allowable costs, and finding adequate program space. In some of these cases, projects settled for less money than they hoped for or eliminated some planned activities.

Examples of FSNE Budget Development Process at the Local Level

Arkansas: The Montgomery County Cooperative Extension agent began the budget development by working with the Associate District Director to determine the percentage of time the Family and Consumer Services (FCS) would devote to FSNE. The next step was securing local-source funds from the schools and letters from principals committing a certain number of teacher hours to FSNE classes. The FCS agent obtained a waiver for the Senior Adult Center, on the basis that its clients were at 185 percent of the poverty level or below. The agent then determined the funds needed for curriculum materials, printing newsletters, travel, supplies, and equipment. The agent and the Associate District Director reviewed the total budget before submitting it to the implementing agency.

Colorado: The Jefferson County Cooperative Extension office developed their budget in consort with guidance provided by the implementing agency, the Cooperative Extension Service at Colorado State University. The implementing agency provided a format for completing the FSNE budget, along with detailed instructions. Three Statewide conference calls were held between the local projects and the implementing agency director and budget director. The first call provided an overview of the budget planning process. The second call reviewed areas that were common trouble spots for many programs, and the third call answered questions. The FSNE agents at the local office talked with local partners and completed the cost-share paperwork. They then compiled information on the costs of office supplies, and time contributed by extension office staff. The FSNE agents worked with the county extension director to determine how much funds the county would contribute.

Iowa: The Decatur County nutrition education program is a member of the Iowa Nutrition Network sponsored by Iowa Department of Public Health. For this project, the budget planning differed depending on the school. In one school, the county worked one-on-one with the home economics teacher to plan 12 educational sessions and get the teachers' buy-in. In another school, the county worked with the grants coordinator, while in the third school, they worked with the school nurse. For each of these cases, the county left it up to the school as to which classes would participate in FSNE. Once the schools decided, the county gave them guidance about how much time to budget for the teacher, and asked for their salary rates. The Decatur County staff consolidated information from all school districts into a local budget. This then defined how much funding the county would get from the implementing agency. The county's objective was to ensure that funding was sufficient to provide enough supplies for each classroom and to cover the registered dietitian's salary.

Local projects received assistance from their implementing agencies on budget development. The focus of such assistance included how to interpret FSNE Plan Guidance, allowable costs, what qualifies for non-Federal FSNE funds, how to develop partners, and how to fill out the budget template provided by the implementing agencies. Methods used for such assistance typically included conducting annual training on FSNE budgeting and providing frequent or as-requested assistance “back and forth” by phone and written communications. Less frequently mentioned methods were site visits and Statewide conference calls.

Approval of Local Project Plans

Nearly four out of five respondents of the implementing agency survey indicated that the initial approval of local project and/or subcontractor plans was made by the implementing agency alone. In general, the implementing agencies interviewed indicated that State agencies had no input in the decisions to fund local projects and/or subcontractors. During the implementing agency and FNS review of the FSNE budget, the majority of local projects experienced no problems. Those who encountered issues reported that they had to document their space allowance, explain sources of non-Federal funds, and justify allowability of expenses. Local projects resolved these issues by reducing the budget, staff, and/or services, and/or by providing more clarification and justification.

About one in five implementing agencies with local projects or subcontractors reported denying funding for FY 2004 to a local project or subcontractor. The main reasons cited for denial of funds were: inability to provide qualifying non-Federal contributions (62 percent of implementing agencies that denied funds), insufficient local plan (46 percent), and inconsistency between the selected target audience and implementing agency priorities (46 percent) (Exhibit A4-9).

Approval of Implementing Agency Plans by State Agencies

Prior to becoming a formal implementing agency, the agencies desiring to be included in the State plan were normally required to submit a plan for providing FSNE services. The State agency’s primary role in FSNE plan development was to review the plans that potential implementing agencies submitted and either approve their inclusion in the overall State plan, or reject the agency’s application to become an implementing agency. About one-third (34 percent) of the State agencies surveyed approved any potential implementing agency that submitted plans meeting the FSNE Plan Guidance requirements. However, prior experience as an implementing agency providing FSNE appears to have been a dominant criterion for approval of FSNE plans submitted from implementing agency applicants. While 33 percent of State agencies reported that they selected only the implementing agencies with prior FSNE experience, most of the State agencies that checked “Other” also explained that they simply continued to work with the implementing agencies that started FSNE in previous years (Exhibit 4-4).

Exhibit 4-4. State Agency's Reasons for Selecting Implementing Agencies to Include in the State FSNE Plan in FY 2004

Reason for Inclusion	Percent of SFSAs
Any potential implementing agency that met the requirements of the guidance was included	34%
Only those implementing agencies with prior FSNE experience were included	33
Agency used a competitive bidding system, and only implementing agencies with plans that met our competitive criteria were included	6
Agency established State-level goals and objectives for funding, and only those that fit within our funding priorities were included	4
Agency used a committee of nutrition education experts who reviewed and approved any implementing agency included in the plan	4
Other (mostly "continuing to work with the same implementing agencies from prior years")	39
Number of Respondents: 49	

Note: "SFSAs" refers to State food stamp agencies. One or more responses were given by each respondent.

Source: State Agency Survey

State food stamp budget officers or program directors commonly reviewed the budget submitted by implementing agencies. A large majority of State agencies surveyed reported using the following criteria for reviewing implementing agency budgets:

- Proposed expenses were reasonable and necessary as defined by FSNE Plan Guidance, for nutrition education activities (82 percent),
- Calculations were free of errors (80 percent),
- Adequate documentation was provided as basis for estimates (70 percent), and
- Adequate assurances were included that non-Federal in-kind or cash contributions were allowable and provided as budgeted (70 percent).

Among 23 State agencies interviewed, 83 percent indicated that their review criteria worked well. None of the implementing agencies interviewed reported that they needed to defend or justify their share of the State FSNE plan to the State agency.

Sixty-five percent of implementing agencies interviewed said they encountered no problems in the plan development or approval process. However, about one-third of implementing agencies interviewed described various types of problems they encountered in the budget development and approval process. The issues included (in the order of prevalence): length of time for the approval process, staff salary and hiring freezes, agency budget freeze, changing fringe rates, discrepancies between the State and the Federal fiscal years, definition of in-kind program space, and requirement for prior approval of equipment purchases. Some of these problems occurred after the budget submission to FNS but before the final approval. Resolution of these problems involved removing an item from the budget or cutting back or eliminating some of the planned services in their plans.

Only 8 percent of State agencies surveyed (four States) reported that they had denied FSNE funding to any organization that applied to be an implementing agency in FY 2004. Among these few States, some States denied funding on the basis that the proposed FSNE activities were not consistent with priorities of the State agencies or the activities duplicated services that were already underway or planned by another

organization. Other reasons for denial of funding related to inconsistencies with the FSNE Plan Guidance, such as: inclusion of an inappropriate target audience in the proposal, lack of appropriate non-Federal funds, inclusion of nonallowable costs, and assessment by the State agency that the activities proposed are not approvable.

Implementation of the FSNE Plan

Once the FSNE Plan was approved, it was usually implemented as intended. The majority of implementing agencies surveyed (88 percent) stated their FY 2004 FSNE plan was fully or mostly implemented as approved (Exhibit A4-10). Only 7 percent reported that their plan was not at all implemented as approved.

When there was deviation from the plan, it rarely impacted the goals, messages, or service delivery model. Instead, changes involved the number of classes or location. Among the 12 percent that had major deviations from the plan, reasons reported were: staffing shortages and/or an inability to hire qualified staff (62 percent) and a shortfall of non-Federal contributions that required adjustments in the number and type of FSNE activities (29 percent) (Exhibit A4-11). During site visits, both of these issues were repeated regularly, however, the interview responses suggested that the consequences of plan changes were generally minor.

CHAPTER V. DELIVERY OF FSNE

The purpose of FSNE is to achieve and sustain positive changes in eating and nutrition-related behaviors for those on a limited budget. To achieve these behavior changes requires multiple, coordinated channels of education tailored to the needs of individuals within their families, communities, and social structures. This chapter describes FSNE's efforts to make these critical changes, including specific goals chosen, scope of services, methods of delivery, and how delivery was coordinated with other nutrition-related agencies.

CHAPTER HIGHLIGHTS

Purpose of Activities

- Implementing agencies emphasized multiple Dietary Guidelines for their target populations.
- The greatest proportion of implementing agencies placed a high emphasis on "Choose a variety of fruits and vegetables daily" (96 percent), and on "Let the Pyramid guide your food choices" (81 percent).

Scope of Services

- Participants were most likely to be school-aged children (42 percent), adults (36 percent), women (70 percent of adults), food stamp recipients (51 percent).
- The majority of local projects targeted food stamp participants or applicants.
- State food stamp agencies reported on average that 82 percent of counties were being served by some level of FSNE, with 42 percent reporting that every county in their State was served.

Coordination of Food Stamp Nutrition Education

- The most frequently coordinated components of FSNE among implementing agencies were information and data sharing (96 percent), plan development (88 percent), and message delivery (87 percent).
- WIC and EFNEP were most often coordinated with FSNE, and most likely to be well-coordinated.

Methods of Delivery

- The vast majority of implementing agencies used direct (98 percent) and indirect education (87 percent) as delivery methods, while a third (33 percent) of implementing agencies used social marketing.
- Multiple group sessions were the most common direct education delivery mode across various participant groups and service delivery settings.

Materials and Curricula

- Most implementing agencies (77 percent) relied on existing education materials or curricula rather than creating their own.
- While all implementing agencies used some sort of curricula, there was wide variation in the specific curricula chosen. The most commonly used were Fight BAC (81 percent), Eat Smart, Play Hard (73 percent), and Nibbles for Health (47 percent).

FSNE as a Benefit of the Food Stamp Program

- While 94 percent of State food stamp agencies and 88 percent of implementing agencies viewed FSNE as a Food Stamp Program benefit, only 66 percent of State agencies, and 78 percent of implementing agencies specifically promoted FSNE as such.

Gaps in Service

- Reasons for gaps in service include inability to document income of participants, general lack of resources, and inherent issues in reaching the target population.

Purpose of Activities

In FY 2004 the four core areas of Improved Dietary Quality, Food Security, Food Resource Management, and Food Safety identified in the FSNE Plan Guidance formed the conceptual framework from which implementing agencies based their activities. Within the context of the four core areas, implementing agencies typically emphasized multiple components of the *Dietary Guidelines for Americans* for their target populations: 98 percent of implementing agencies used “Be physically active each day,” 99 percent used “Let the Pyramid guide your food choices,” and 99 percent used “Choose a variety of fruits and vegetables daily” (Exhibit 5-1). The least-used dietary guideline was “If you drink alcoholic beverages, do so in moderation,” used by only 49 percent of implementing agencies. Of those who used that guideline, 76 percent reported a low level of emphasis.

The level of emphasis placed on each of these guidelines differed by implementing agency. The greatest proportion of implementing agencies placed a high emphasis on the messages “Choose a variety of fruits and vegetables daily” (96 percent), and 81 percent of implementing agencies placed a high emphasis on “Let the Pyramid guide your food choices.” In addition, a majority of implementing agencies placed a high emphasis on “Keep food safe to eat” (62 percent). In comparison, only 31 percent placed a high emphasis on “Aim for a healthy weight,” 15 percent on “Choose and prepare foods with less salt,” and 33 percent on “Choose beverages and foods to moderate your intake of sugars.” There are no significant differences on which dietary guidelines were used by the types of implementing agencies.

Exhibit 5-1. Implementing Agencies’ Use of Dietary Guidelines

Dietary Guidelines	Percent that Used Guideline	Of Those Who Used Guideline, the Level of Emphasis (%)			
		Low	Moderate	High	Don't Know
Let the Pyramid guide your food choices	99%	4%	13%	81%	3%
Choose a variety of fruits and vegetables daily	99	1	3	96	0
Be physically active each day	98	24	38	36	3
Keep food safe to eat	95	8	27	62	3
Choose a diet low in saturated fat and cholesterol and moderate in total fat	92	21	38	42	0
Choose beverages and foods to moderate your intake of sugars	90	20	46	33	1
Choose a variety of grains daily, especially whole grains	89	19	3	44	2
Aim for a healthy weight	86	21	47	31	2
Choose and prepare foods with less salt	84	45	37	15	3
If you drink alcoholic beverages, do so in moderation	49	76	20	2	2
Number of Respondents: 79					

Note: One or more responses were given by each respondent.

Source: Implementing Agency Web-based Survey

The interview data suggested that nutrition education was provided within the context of a client’s limited budget. Making food dollars stretch while still eating nutritious meals was cited as an educational goal by various stakeholders at the implementing agency and local levels.

Many implementing agencies, such as in Nevada, operated on the premise that nutrition education helped to build life skills and should be a vital part of the K-12 school curriculum. The messages to students were to eat a variety of food and to increase the consumption of fruits and vegetables. In Idaho, the “Got Calcium” youth curriculum was composed of four lessons aimed at instilling knowledge and changing behavior to increase the consumption of calcium-rich foods. This tested curriculum was intricately linked to the Idaho Teaching Standards, which made it very popular among teachers and principals.

Including Environmental Change in FSNE: Nevada’s Approach to Changes in the Schools

In Nevada, one of the university-based FSNE project’s key goals is to change the school environment to both put in place healthier food alternatives for children making food selections at vending machines, but also to encourage teachers and administrators to incorporate nutrition education into various aspects of classroom learning. Working in schools with large low-income populations, the nutrition educators coordinated with teachers and administrators to identify opportunities to integrate nutrition education into regular classroom activities. For example, one teacher conducted a spelling bee using the names of fruits and vegetables as the target words. Additionally, school-wide nutrition education activities were used to promote and reinforce information taught in the classroom. The goal of integrating FSNE with regular education was to assure that nutrition education would continue even if FSNE were no longer able to provide direct education at the schools.

At the local level, FSNE goals were defined by the FNS four core areas. Most often, local projects/subcontractors reported the following goals: increasing fruit and vegetable intake (62 percent), improving dietary quality (52 percent), and improving food safety (34 percent) (Exhibit A5-1). There were few local projects that described a message outside of the four core areas, except for addressing the importance of physical activity. One local project mentioned addressing money management and budgeting as a primary goal. Many of their clients did not have basic budgeting knowledge, which is vital when trying to stretch food dollars.

The basic objectives of FSNE at the local level were consistent with implementing agencies’ objectives, i.e., about 65 percent of local projects focused on both knowledge and behavior change, although some projects focused primarily on increased knowledge or behavior change. The local projects interviewed described a wide range of topics that were the focus of their plans for nutrition education. The most commonly cited topics were: the importance of eating fruits and vegetables, nutritional quality of diets, food safety, the importance of physical activity, and food resource management (this issue is discussed further in Chapter V).

Local projects’ reasons for targeting certain topics included the following: there was a good match between the educational message and the local project’s overall program mission; the message and curricula addressed the nutritional needs of the target audience (e.g., vegetable consumption being too low among the target population); culturally appropriate messages for the target audience; an approach to promote a healthy diet that is economically feasible; and an effort to prevent diabetes and obesity. Some reasons were based on feasibility of service delivery, such as the ease of working with fruits and vegetables in a classroom setting.

Many Cooperative Extension implementing agencies providing nutrition education tended to provide a choice to locals of numerous messages and approved curricula within the four core areas. Messages were selected after consulting with the local partner and class participants. Local projects and subcontractors reported that the messages chosen varied according to the age of the target audiences. Messages to youth were more likely to focus on increasing calcium intake, picking healthy snacks such as fruits and vegetables, and engaging in physical activity. Adults were exposed to all of those topics and, in addition, were taught about food resource management and menu planning.

Targeting Children as Family Caregivers: The Flagler County Experience

In Flagler County, Florida, the local FSNE project identified the fact that many of the older children with whom they were working were often responsible for shopping and cooking for their families. In many cases, these children came from single parent homes, where the parent worked all day and expected the children to help with cooking and shopping. While primarily using a State-level curriculum for their direct education project, the local staff incorporated several additional lessons and activities to promote smart food choices, food safety, and healthy eating. Children developed a school garden, where they could go and select fresh fruits and vegetables to take home. In addition, they made field trips to supermarkets, where they learned how to stretch food dollars and make smart selections. They also participated in cooking classes and demonstrations, and later were able to combine all of these skills by adopting a senior center and preparing a special meal for their adopted seniors. The children planned the menus, developed promotional posters supporting the nutritional value of the food they selected, purchased the food (with donated funds), and prepared and served the meals. These skills were then transferred to their home shopping and cooking experiences.

Cultural Adaptation of Messages. Most implementing agencies and local projects/subcontractors did not adapt messages to accommodate cultural influences on dietary practices. Instead, cultural influences were addressed through educational materials, culturally acceptable foods, bilingual educators, and curricula. A few modifications, however, were made to messages and are listed below:

- In Minnesota, a Tribe subcontractor stated that there was a great focus on wild rice, food preservation, and community gardens.
- In Arizona, a subcontractor reported that it was challenging to teach Tribal people the benefits of nonfat milk. Lactose intolerance was a concern, so other forms of calcium were emphasized. Another message was “Fry bread in moderation.”
- In Oklahoma, one local project worked with Spanish-speaking young adults in an English class to teach them about nutritious foods outside of their typical diet. Exposing these students to new foods offered an opportunity to learn new English words, as well as helping them to improve their dietary quality.

Targeting Latinos in California: The Fresno County Latino 5-A-Day Campaign

The Fresno County Cooperative Extension office was somewhat unusual, in that it received funds from two separate implementing agencies to conduct a number of diverse FSNE projects. The project funded by the California nutrition network was to conduct a version of the popular 5-A-Day program specifically addressing the needs of Latino audiences in three rural counties. The top three FSNE activities for the Latino 5-a-day project included conducting a social marketing campaign through local television and radio, conducting promotional activities at retailers, farmers' markets, Latino festivals and community organizations, and local agricultural fairs. Services were delivered through social marketing, including media promotions, printed materials, and outreach activities. Through this campaign, they delivered over one million media impressions.

Scope of Services

Participant Demographics¹⁷

Implementing agencies were asked to estimate the demographic characteristics of the population served by FSNE. While 89 percent of implementing agencies made this estimate for at least one demographic category, only 33 percent of agencies were able to provide an estimate for every demographic category. Because the distribution was estimated, agencies tended to list round numbers (such as 25, 30, or 35 percent). Through site visits, it became more apparent that some agencies did not systematically collect an unduplicated demographic count of participants. Despite these limitations the data provide the best available national description of the demographics of nutrition education participants. This description is presented below and in Exhibit 5-2. The demographic statistics represent the population served by the average implementing agency, not the FSNE participant population as a whole (i.e., data are not weighted by implementing agency size).

Age. School-aged children (5–17 years) and adults (18–59 years) comprised the largest cohorts (42 percent and 36 percent, respectively) of FSNE participants (Exhibit 5-2). Elderly and young children, including infants, jointly accounted for about 21 percent of all participants. A total of 68 implementing agencies (81 percent) were able to report on this measure.

Race/Ethnicity. For race, 59 percent of participants were white, 23 percent were black/African-American, 8 percent were American Indian/Alaskan Native, 2 percent were Asian, 1 percent were Native Hawaiian/Pacific Islander, and 6 percent were some other race or a combination of two or more races (n=63). For ethnicity (n=62), approximately 20 percent of FSNE participants were identified as Hispanic or Latino (Exhibit 5-2).

¹⁷ The study did not collect information on the number of clients served by FSNE. These data were not collected because at the time of the study data collection, implementing agencies and States had no standardized method of collecting client information. Some agencies counted client encounters, while others maintained an unduplicated count of individuals who attended FSNE activities. It was also not possible to obtain accurate counts of individuals receiving information through social marketing campaigns.

Gender. Females constituted the majority of the FY 2004 FSNE participants. In fact, implementing agencies reported serving more than twice as many females as males (70 and 30 percent of all adults, respectively). A total of 64 implementing agencies (76 percent) estimated this demographic category.

Family Status. Respondents indicated that individuals, rather than families, constituted the majority (58 percent) of their participants (Exhibit 5-2).

Food Stamp Recipients. Just over half (51 percent) of FSNE participants were food stamp recipients or applicants, while 23 percent were income-eligible nonparticipants (Exhibit 5-2). A total of 54 implementing agencies (64 percent) were able to report on this measure.

Only 40 percent of local projects reported that they specifically targeted or served food stamp recipients. They typically had a broader low-income target population, but the majority were FSP participants or applicants.

Many FSNE entities reported specific challenges in collecting information to document the income eligibility for food stamps. In one community the Council on Aging asked FSNE to provide workshops, but the local project could not demonstrate the exact income levels of that population. Similarly, day care centers frequently called requesting FSNE, but were not able to collect adequate income information. In most of these instances, implementing agencies and local projects tried to collect income information directly from individuals. Potential partners often did not feel comfortable asking their clients for this personal information. These FSNE entities did not report using alternative means, such as community-based measures to approximate the average income of individuals from specific neighborhoods.

Exhibit 5-2a. FY 2004 FSNE Participants' Demographics

Demographic Category	Number Able to Provide Data	Percent Able to Provide Data	Of Those Able to Provide Data, the Mean Percent of Participants			
			School-aged Children (5-17 years)	Adults (18-59 years)	Elderly Persons (60+)	Infants and Young Children (Under 5 years)
Participants' Age	68	81%	42%	36%	14%	7%

Exhibit 5-2b. FY 2004 FSNE Participants' Demographics

Demographic Category	Number Able to Provide Data	Percent Able to Provide Data	Of Those Able to Provide Data, the Mean Percent of Participants	
			Not Hispanic or Latino	Hispanic or Latino
Participants' Hispanic or Latino Status	62	73%	79%	18%*

Exhibit 5-2c. FY 2004 FSNE Participants' Demographics

Demographic Category	Number Able to Provide Data	Percent Able to Provide Data	Of Those Able to Provide Data, the Mean Percent of Participants					
			White	Black or African American	American Indian or Alaskan Native	Asian	Native Hawaiian or other Pacific Islander	Other (including two or more races)
Participants' Race	63	75%	59%	23%	8%	2%	1%	6%

Exhibit 5-2d. FY 2004 FSNE Participants' Demographics

Demographic Category	Number Able to Provide Data	Percent Able to Provide Data	Of Those Able to Provide Data, the Mean Percent of Participants	
			Female	Male
Participants' Gender	64	76%	70%	30%

Exhibit 5-2e. FY 2004 FSNE Participants' Demographics

Demographic Category	Number Able to Provide Data	Percent Able to Provide Data	Of Those Able to Provide Data, the Mean Percent of Participants	
			Individuals	Families
Participants' Family Status	53	63%	58%	42%

Exhibit 5-2f. FY 2004 FSNE Participants' Demographics

Demographic Category	Number Able to Provide Data	Percent Able to Provide Data	Of Those Able to Provide Data, the Mean Percent of Participants			
			Food Stamp Recipients or Applicants	Food Stamp Eligible Nonparticipants (incoming up to 130% of poverty)	Other Low Income Persons (income up to 185% of poverty)	Other Persons (≥185% of poverty)
Income and FSP Status of FSNE Participants	54	64%	51%	23%	19%	6%

* We included respondents whose percentages for demographic categories added up to 90 percent or more, therefore the averages within each category may not add up to 100 percent.

Source: Implementing Agency Web-based Survey

Geographical Coverage of FSNE

State food stamp agencies reported that 82 percent of counties on average were served by FSNE in FY 2004, with 42 percent reporting that every county in their State was served (Exhibit 5-3).

Exhibit 5-3. Percent of Counties in a State Served by FSNE

Percent of Counties Served	Percent of States
100%	42%
75-99.99%	30
50-74.99%	22
25-49.99%	4
0-24.99%	2
Number of Respondents: 50	

Source: State Agency Survey

The geographic coverage of implementing agencies within States varied substantially. While 45 percent of implementing agencies delivered some level of FSNE service within 75 to 100 percent of all counties in their State in FY 2004, 29 percent delivered some level of FSNE service within fewer than 25 percent of counties in their States (Exhibit A5-2). Because there are multiple implementing agencies in 20 States, some counties may be served by more than one implementing agency, possibly targeting different participant groups, while other counties may not be served at all.

More than one-half (58 percent) of the implementing agencies reported that there was no change in the overall geographic coverage of their service area between FY 2003 and FY 2004 (Exhibit A5-3). About one-third of the agencies (32 percent) reported increasing such coverage, and 10 percent indicated reducing it. While implementing agencies were not asked in the survey why such changes occurred, interviews conducted during the site visits seemed to indicate that growth or contraction was mostly a function of the availability of non-Federal funds to support projects.

A large proportion of local projects interviewed felt that there were areas or populations that needed FSNE services but were not reached. Such areas were usually in remote or rural regions of the State. One implementing agency stated, "There are counties that aren't being served because there is no one to take this task on and the implementing agency doesn't have funds to hire someone to start it up." Also, given that in rural areas the population is spread out throughout a large area, the long distance necessary to travel to a class means that very few attend. In such circumstances, home visits become a likely, but costly, option. Finally, serving rural areas often requires more travel and increases costs. Some local projects pointed out that local partners provide staff time as a source of non-Federal funds while FSNE is being delivered, but this contribution does not cover the non-Federal share of travel time. This poses a constraint for local projects that count on partner contributions for their non-Federal funds.

Coordination of Food Stamp Nutrition Education

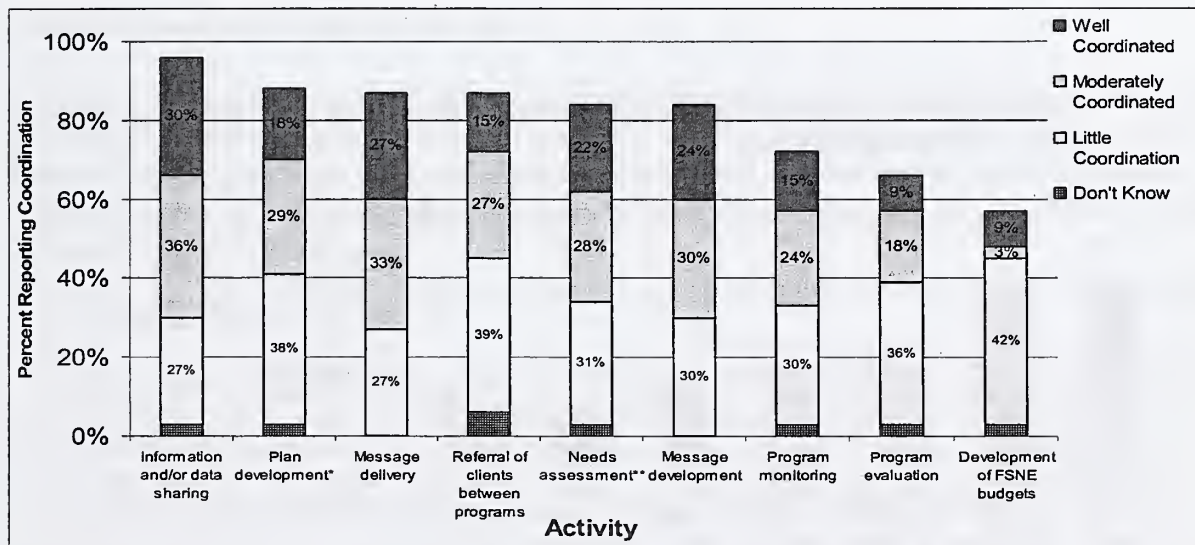
The delivery of nutrition education is coordinated with multiple partners at the State and local levels. For purposes of discussion we have categorized these partners as 1) other implementing agencies within the State, 2) other USDA-funded agencies in the State, and 3) non-USDA funded organizations.

Partnering with Other Implementing Agencies

In States with more than one implementing agency, a potential “partner” could be another FSNE implementing agency. The most frequently coordinated components of FSNE among implementing agencies were information and data sharing (96 percent), plan development (88 percent), and message delivery (87 percent). Development of FSNE budgets, program evaluation and program monitoring were less likely to be coordinated (Exhibit 5-4).

One issue observed in interviews, however, was related to the availability of local non-Federal funds, which are limited. As implementing agencies grow, they may begin to compete for local contributions and FSNE audience. While this did not seem to be a big issue at the moment, two implementing agencies stated they could see it as a potential problem in the future.

Exhibit 5-4. Level of Coordination Among Implementing Agencies



Number of Respondents: 33, *Number of Respondents for Plan Development is 34, **Number of Respondents for Needs Assessment is 32.

Note: One or more responses were given by each respondent.

Source: Implementing Agency Survey

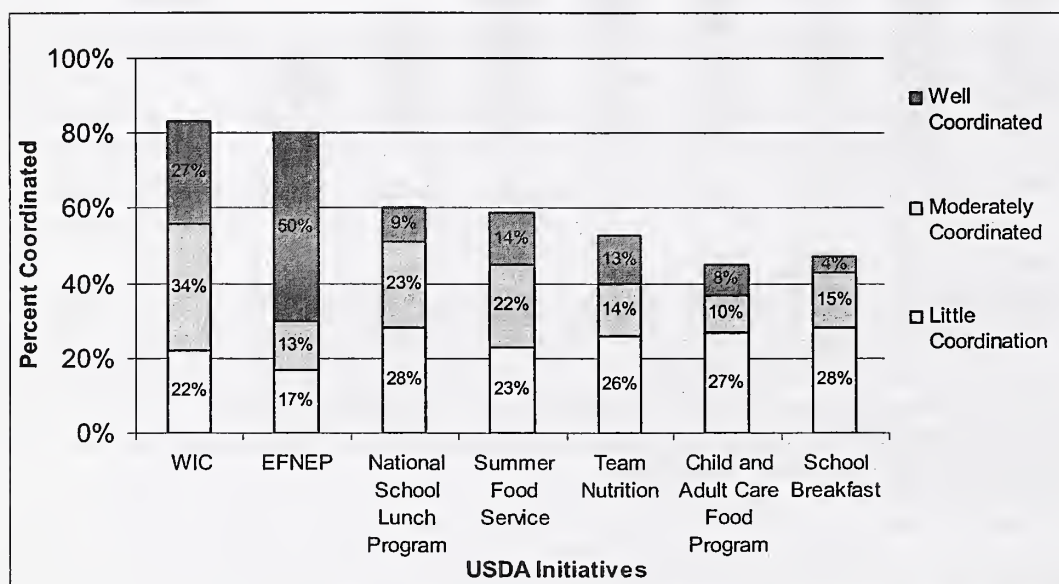
Partnering with Other USDA-Funded Programs

WIC and EFNEP were the USDA-funded programs most often coordinated with FSNE, and the success of the coordination was most likely to be reported as “well” (WIC, 27 percent and EFNEP, 50 percent). In comparison, the National School Lunch, Summer Food Service, Team Nutrition, Child and Adult Care Food Program, and School Breakfast were not as often, or as well, coordinated with FSNE. (Exhibit 5-5).

Strong Partnerships: The Michigan Breast Feeding Initiative

In Michigan the Breast Feeding Initiative has been a long-standing partnership between WIC and the Michigan State University (MSU) implementing agency. At the local level, WIC referred its clients to "peer counselors" at the county extension FSNE program for more intensive breastfeeding support, including a visit to the hospital, at least one home visit, and weekly calls. The peer counselors were supported by certified lactation counselors. In FY 2004, WIC gave \$500K to MSU for the Breast Feeding Initiative. As the WIC Nutrition Director stated, "The collaboration makes a lot of sense. WIC doesn't have the capacity to provide intensive in-home support but does have access to low-income pregnant women, while MSU has the experience and know-how of providing home-based services." WIC also received data regularly from MSU to monitor the peer counseling. Data indicated that those who received peer counseling from MSU FSNE breastfed longer than those who did not.

Exhibit 5-5. Perception of Implementing Agencies on Extent of Coordination with Other USDA Initiatives



Note: Exact number of respondents varied by USDA Initiative ranging from 76 to 79 respondents for each initiative. Additionally, one or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Information and/or data sharing, referral of clients, and delivery of nutrition education are the components of FSNE most likely coordinated among implementing agencies and other USDA-funded initiatives. The components reported to be the least coordinated include program monitoring, program evaluation, and budget development (Exhibit A5-4).

Coordination of FNS-Funded Programs: The Hawaii Experience

One of the most innovative approaches to coordination of FNS programs occurred in Hawaii, where representatives from all FNS-funded programs worked together on a coordinating council to promote nutrition education in a consistent manner. This group was started by the local FNS Federal representative in Hawaii, and became a successful vehicle for program coordination. This group met quarterly, and developed common themes and messages that were reinforced throughout all of their programs. In FY 2004, all agreed that promotion of fruits and vegetables would be their theme, and common and coordinated messages regarding this topic were used in WIC, the National School Lunch and School Breakfast Programs, Summer Food Service, and FSNE. The group often discussed how to share and coordinate resources, including space, staff, and materials.

Partnering with Non-USDA Programs

In FY 2004, 38 percent of implementing agencies reported having formal collaborative relationships for the purpose of coordinating FSNE activities with other nutrition education initiatives in their State. Of those implementing agencies that reported a formal partnership, the most frequently cited collaborations occurred between State Departments of Education (45 percent) and other university or academic centers (39 percent) (Exhibit A5-5).

Georgia Partnerships

In one of the implementing agencies in Georgia, FSNE was provided in partnering senior centers through nutrition education classes, cooking demonstrations, and educational materials. Classes focused on nutritional needs, budgeting, food safety, and cooking techniques. The FSNE implementing agency also conducted evaluations of selected interventions, including baseline intake data collection (in-person interview) and follow-up. The local partners provided information to clients about classes, set up classes, assisted in teaching, and delivered nutrition education materials for indirect education to homebound Meals on Wheels customers. The local partners also took seniors shopping, using pointers from the FSNE local project to promote economical and nutritious choices. Both the local partner staff and the FSNE educator provided phone follow-up to homebound elders.

Methods of Delivery

For purposes of this study, three FSNE delivery methods were defined: direct education, indirect education, and social marketing. The definitions of these terms given to survey and interview respondents are provided below:

- **Direct education** – Nutrition education interventions where participants were actively engaged in the learning process, either with an educator or through interactive media, such as kiosks or interactive web sites. The most common form of direct education was group lessons provided to FSNE participants.

- **Indirect education** – Distribution of information and resources that were primarily designed to increase public awareness of FSNE and/or that reflected FSNE Plan Guidance for key FSNE core elements. Indirect education included any mass communications, public events and materials distribution that were not part of social marketing or direct education efforts.
- **Social marketing** – A disciplined, consumer-focused, research-based process to plan, develop, implement, and evaluate interventions, programs, and multiple channels of communications that were designed to influence the voluntary behavior of a large number of the target audience. A social marketing campaign had to include the following three features:
 - The campaign targeted a specific segment of the food stamp-recipient, low-income population.
 - The campaign addressed the specific nutrition needs of the target audience, associated behaviors, and their perceptions about reasons for and against changing behavior.
 - The campaign included interacting with the target audience to determine whether the message, materials, and delivery channel(s) were understood and meaningful and, thus, whether they had the potential to lead to behavior change.

The vast majority of implementing agencies used direct education as a delivery method (98 percent). Most also used indirect education (87 percent), while one-third of implementing agencies used social marketing (33 percent). No implementing agency reported only using social marketing or indirect education, and only 12 percent reported using only direct education. Instead, the majority of implementing agencies used a combination of methods, with 55 percent using direct and indirect education, and 31 percent using all three (Exhibit 5-6).

Exhibit 5-6. Delivery Methods Used Singularly or in Combination

Combinations of Delivery Methods	Percent of Implementing Agencies
Direct and Indirect Education	55%
Social Marketing, Direct and Indirect Education	31
Social Marketing and Direct Education	1
Social Marketing and Indirect Education	1
Only Direct Education	12
Only Social Marketing	0
Only Indirect Education	0
Number of Respondents: 77	

Source: Implementing Agency Survey

The type of delivery method (i.e., direct or indirect education, social marketing) and format varied by the resources available at a particular local project/subcontractor, the partnerships created, and most importantly on the needs of the local population. Local projects and nutrition educators reported adapting classes to the needs of their population by having flexible schedules with night and weekend classes. They also reported conducting classes in Spanish or using the services of a translator. Regardless of how they might be tailored to specific audiences, the content of nutrition education was fairly standardized.

Direct Education

During interviews, implementing agencies stated that, from time to time, they held one-time educational events, or encouraged one-on-one contacts, but most reported that direct education usually took the form of a series of classes. Almost every implementing agency reported the use of a series of classes to drive the message home. The classes allowed them to reach the most people using the resources available. “One to one is probably more effective [than group classes] but not very cost-effective,” noted one implementing agency. Other implementing agencies noted the educational benefits of interactions among participants, making nutrition education more engaging and empowering.

Class series were typically between two and eight classes long. In site visits, local projects reported that the proportion completing the series varied widely, although they did not clarify the reason for this variation.

The locations used for direct education indicate the particular importance placed on reaching youth compared to other populations: 81 percent of implementing agencies provided direct education in public schools, and 75 percent provided direct education in youth education sites such as YMCAs and preschools (Exhibit 5-7). Seventy-three percent of implementing agencies conducted direct education in elderly services sites, and 68 percent did so in emergency food assistance sites. Additionally, a high percentage (66 percent) of implementing agencies reported providing services at WIC clinics. Forty-six percent of implementing agencies provided direct education in food stamp offices and 49 percent in homes of FSNE clients.

The mode of direct education delivery varied by type of setting. Some delivery methods were more likely to favor just one type of setting. Multiple group sessions comprised the largest proportion of direct education delivery modes in public schools (90 percent), other youth education sites (79 percent), and elderly service sites (67 percent) (Exhibit 5-7). However, 51 percent of food stamp offices used single group sessions to deliver direct education. The remaining settings including emergency food assistance sites, WIC clinics, and food stamp offices, were more likely to use a variety of direct education delivery modes.

When asked why direct education was the most prevalent, implementing agencies described how direct education provided the opportunity for interactive teaching, the ability to tailor messages to specific needs, and the ability to get feedback from clients. Direct education also yielded reliable statistics about the number of clients reached.

Interviews with nutrition educators indicated that for classes to be effective and encourage participation, use of visual aids and hands-on activities, such as cooking demonstrations, needed to be built into the lesson plan. Discussions and continuity also helped make classes more effective. Assigning homework and discussing topics such as “who ate new foods” at the next class helped promote this continuity. Nutrition educators reported that lectures without visual aids or hands-on demonstrations were more likely to occur when the classes were large. Almost half of the nutrition educators interviewed reported that their classes averaged more than 20 people.

Exhibit 5-7. Settings and Instructional Format Used for Direct Education by Implementing Agencies

Setting	Percent using this setting	Of those who used setting, the percent citing as most frequent mode of delivery in setting				
		One-on-one single session with educator	One-on-one multiple sessions with educator	Group single session with educator	Group multiple sessions with educator	Other - Individual (self-taught)
Public schools (K-12)	81	0	0	8	90	2
Youth education sites, such as preschools, day care, YMCA, etc.	75	2	2	16	79	2
Elderly services sites	73	4	4	22	67	4
Emergency food assistance sites	68	31	4	25	37	4
WIC clinics	66	18	14	22	35	12
Churches/faith-based organization sites	64	6	2	23	69	0
Adult education and training sites	62	2	2	15	81	0
Homes of FSNE clients	49	26	56	3	15	0
Food stamp offices	46	20	9	51	14	6
Local Cooperative Extension offices	46	3	3	14	80	0
Health care sites	42	16	13	26	42	3
Food stores or other retail outlets	26	48	0	33	14	5
Other	20	0	0	13	73	13
Work sites	13	10	0	30	60	0
Number of Respondents	77					

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Various implementing agencies offered in-depth lessons on nutritious, affordable shopping beyond classroom lessons. For example, in Minnesota, supermarket tours were provided, while shopping assistance was provided to seniors in Georgia. Massachusetts used several creative forms of interactive delivery, offering demonstrations at farmers' markets, heavily emphasizing visual aids, and including cooking demonstrations, food tastings, movement, and music in their classes.

Direct Education in Food Stamp Offices. Forty-six percent of implementing agencies surveyed reported the direct delivery of FSNE in local food stamp offices. The most common mode of direct education delivery in this setting was to conduct one-time sessions, either to individuals (20 percent) or groups (51 percent). Only 14 percent of implementing agencies conducted multiple sessions within the local food stamp offices.

Among the implementing agencies interviewed, about half stated that they provide FSNE in some food stamp offices. These results are similar to the survey response data. Among the implementing agencies that did provide FSNE in food stamp offices, only seven reported that they hold direct education classes, which is less than what was indicated on the responses to the survey. Four of these seven implementing agencies reported that their efforts in direct education were probably not very effective because the classes

were one-time sessions, and it is difficult to prompt behavior change in the allotted amount of time. The most common reason for not conducting direct education at all was due to a lack of separate space in the food stamp office for conducting nutrition education; the implementing agencies believed that the waiting room of the food stamp office is a poor venue for the classes due to myriad activities occurring in the waiting room (i.e., many people passing through, and participants' focus on their name and/or number being called).

Interviews with local projects/subcontractors revealed similar issues. Only a quarter of respondents reported ever holding activities at food stamp offices, which again is somewhat contradictory to the survey where almost half reported direct education activities. Besides the reasons described above, one local project described how it was extremely difficult to get people to come to the food stamp office for four to six weeks in a row (which was the length of their FSNE class series). While some local projects had held activities at food stamp offices at least once, most were not currently doing so.

Local Food Stamp Office Involvement in Durham County

The Durham County Health Department in North Carolina reported a very strong partnership with the local food stamp offices. This relationship developed because North Carolina uses a county-administered approach to delivering Food Stamp Program benefits. The health department and the local food stamp agency were located within the same area of county government. As a result, the FSNE project received full cooperation from the local food stamp office, including the use of space for delivering classes, distribution of materials, participation of local food stamp officials on advisory groups, and coordination of activities.

Indirect Education

As stated above, 87 percent of implementing agencies reported delivering FSNE messages through indirect education in FY 2004. Among those using indirect education, the most common methods of delivery were print materials (96 percent) and public events such as health fairs (85 percent). Other types of methods described included displays, websites, and videos.

During interviews, almost half of local projects reported that they provided FSNE materials to local food stamp offices. Promotional flyers/brochures were the most common form of indirect education provided to food stamp offices. However, several local projects/subcontractors wondered if their indirect education efforts were effective in reaching and teaching the intended audience. One local project played a FSNE outreach video at the food stamp office, but it did not generate any referrals. Another local project provided local food stamp offices with materials, but the local project was unsure whether the materials were distributed or used.

Getting Everyone Involved: Oklahoma's Experience Incorporating Indirect Education into FSNE

One of the key issues of concern to the Oklahoma State food stamp agency was how to best support the direct delivery of a Statewide nutrition education message to food stamp recipients. It was decided by the State agency that a calendar promoting healthy eating, which had been developed by the University of Oklahoma implementing agency, would be the best vehicle for delivering this message. The State food stamp agency decided that the calendar should receive wide distribution to as many food stamp recipients as possible. The State agency then required that the three other implementing agencies distribute the calendar to their FSNE clients and that all local food stamp offices distribute the calendar as well. As a result, Oklahoma officials estimate that over 50,000 food stamp recipients received the calendar.

Social Marketing

Social marketing as a strategy for FSNE delivery is predicated on the fact that individual behavior change takes place within the larger community and societal context, and that change must be made in these outer spheres of influence as well as at the individual level through the use of multiple channels. This important concept was the driving force behind many of the decisions made by implementing agencies employing this delivery method. Another key concept to those conducting social marketing was to develop a campaign based on research that described the needs of the target population, how they make nutrition-related behavior decisions, and what may motivate them to make healthier decisions.

Scope of Campaign. Social marketing campaigns that were conducted Statewide were likely to differ in approach from those that were concentrated more in specific geographic or regional areas. Geographic limitations were usually associated with the use of paid mass media. For example, in North Carolina, the social marketing campaign was designed to support and reinforce direct education activities. Since the direct education activities were focused in a limited number of counties, the social marketing campaign was only conducted in six of the counties where most of the FSNE participants were located. In California, messages were aired using media outlets in the six largest media markets in the State. These messages were reinforced through the use of bus and transit ads, distribution of printed materials, and outdoor billboard ads.

As presented above, about one-third of implementing agencies conducted social marketing campaigns in FY 2004. Of these agencies, just over half conducted one campaign, 25 percent conducted two campaigns, and 22 percent conducted three or four campaigns. Of those conducting social marketing campaigns, 48 percent of implementing agencies conducted a Statewide campaign. There were no significant differences on the number of campaigns by type of implementing agency nor whether the campaign was Statewide.

From the perspective of the implementing agencies, one of the key elements in conducting a successful Statewide social marketing campaign is to involve multiple programs in reinforcing the message. Although there are some exceptions, social marketing was strongly associated with nutrition networks. Of the 27 implementing agencies with a nutrition network, 17 employed social marketing. Only nine of the implementing agencies that did not have a nutrition network conducted social marketing.

There was marked variation in social marketing campaigns. Arizona, Mississippi, and North Carolina focused their activities on large-scale coordinated campaigns, using media outlets like television and radio to promote tested messages. In contrast, Michigan relied more on efforts that were locale-specific. There was no significant association between type of audience and use of social marketing, whereas dietary quality messages were more likely to be chosen for a social marketing campaign than other types of messages such as food resource management, food security, and food safety.

Arizona's Social Marketing Campaign

The Arizona nutrition network produced comprehensive materials based around the character of Bobby B-Well (and friends). Materials were developed after extensive formative research with the low-income target audience, and messages were subsequently tested in food stamp offices. Bobby B-Well and the supporting materials seemed to be used by all nutrition activities in the State, from elder health to summer feeding programs. This consistency of message was seen as one of the great strengths of FSNE from the perspective of the implementing agency, the State agency, nutrition educators, locals, and partners. An evaluation of the campaign indicated that a large proportion of food stamp recipients were reached by it, and of those reached, they were more likely to have knowledge on specific targeted nutrition topics than those who did not remember the campaign.

Social Marketing Channels. Social marketing campaigns tended to use materials distribution, newsletters, and other printed materials as the key approach, or to supplement mass media. The most frequent channel of social marketing delivery was radio (62 percent), followed by television (46 percent), newspapers, and posters (both 42 percent). About a quarter of implementing agencies utilized mass distribution of materials through local food stamp offices (27 percent). The least used channel was mass mailings to individuals (15 percent) (Exhibit 5-8). Almost half of the implementing agencies used four or more channels to deliver social marketing (Exhibit 5-9). The Iowa nutrition network's campaign Pick a Better Snack, for example, utilized TV, radio, billboards, and bus wrap advertisements. In addition, there were items such as displays used at grocery stores, newsletters for parents, and bingo cards to be used in schools.

There was no particular combination of marketing channels that were used most frequently.

Exhibit 5-8. Social Marketing Channels

Channel	Percent of IAs
Radio	62%
Television	46
Newspapers	42
Posters	42
Videos/DVDs/Audiotapes	27
Mass distribution through local food stamp offices	27
Billboards	19
Bus signs or placards	19
Mass mailings to individuals	15
Number of Respondents: 26	

Note: One or more responses were given by each respondent.

Source: Implementing Agency Survey

Exhibit 5-9. Number of Social Marketing Channels Used

Number of Channels Used	Percent of IAs
Used 1 channels for Social Marketing	16%
Used 2 or 3 channels for Social Marketing	40
Used 4 or 5 channels for Social Marketing	32
Used 6 -8 channels for Social Marketing	12
Number of Respondents: 25	

Source: *Implementing Agency Survey*

Message Development. Social marketing campaigns were developed in a variety of ways. According to interviews with implementing agencies, the most common methods were first to identify the specific target population, and then through formative research, such as focus groups, partner input, and pre/post-test of draft campaign materials, develop a targeted message and campaign.

Fifteen implementing agencies – just over half of the implementing agencies that conducted social marketing in FY 2004 – reported State agency involvement in the development or implementation of the social marketing campaign. The State agency activities reported most often were the provision of information to facilitate reaching food stamp clients, and consultation on message delivery (73 percent for each, Exhibit A5-6). Fewer of these agencies reported State agency involvement in message development (40 percent) or evaluation (33 percent) of the social marketing campaign.

Social Marketing Challenges. Two main challenges arose in the delivery of social marketing. One was that implementing agencies delivering social marketing found it challenging to document the income level of their audience, which is required for complying with the FSNE Plan Guidance. While most tried to use media outlets that could provide the implementing agency with documentation of audience reach, there were cases where the message was distributed to a broader audience that included persons not necessarily eligible for food stamps. The second major challenge was the limited ability of implementing agencies to document the impact of their mass media campaigns. It was much easier to measure an individual's knowledge change after a series of eight classes, for example, than to measure the effect of a TV commercial on the low-income population in the State. It should be noted, however, that implementing agencies conducting social marketing strongly believed that the combination of direct education and a solid media campaign produced the best likelihood for behavior change.

FSNE Materials and Curricula

Implementing agencies drew upon many different sources to obtain nutrition education curricula and materials. FNS was cited most often as the source for FSNE materials and products (77 percent). Other commonly reported sources included the implementing agency itself (75 percent), another implementing agency (74 percent), another USDA agency (71 percent), and another Federal organization (70 percent) (Exhibit 5-10).

Exhibit 5-10. Sources of FSNE Materials and Products

Source of Materials/Products	Percent of Implementing Agencies Reporting this Source
Developed or provided by FNS	77%
Developed by this implementing agency	75
Developed or provided by another FSNE implementing agency	74
Developed or provided by another USDA agency	71
Developed or provided by another Federal organization, such as Department of Health and Human Services or National Cancer Institute	70
Developed or provided by a private nonprofit organization	51
Developed or provided by some other organization	31
Developed or provided by a county- or regional-level affiliate of agency	30
Developed or provided by a private for-profit organization	27
Don't know, local projects or subcontractors select their own materials	8
Number of Respondents: 84	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Web-based Survey*

Implementing agencies used a variety of types of materials to deliver nutrition education. Brochures, booklets, fact sheets, or other informational handouts were used by 99 percent of implementing agencies (Exhibit 5-11). Such materials were typically used to augment approved curricula. Of those agencies, 69 percent developed the materials used. Almost all of the implementing agencies also used nutrition education curricula (97 percent), cookbooks or recipes (92 percent) and posters, displays, and billboards (92 percent). Kiosks and computer work stations were least often used by implementing agencies (16 percent and 30 percent, respectively). Implementing agencies were most likely to create their own staff training/manuals and newsletters, if they used such materials.

Exhibit 5-11. Types of Materials Used for FSNE

Material, Product or Activity	Percent of Implementing Agencies That Used the Material	Of Those That Used Material, Percent Developed by Implementing Agency
Brochures, booklets, fact sheets, or other informational handout	99%	69%
Nutrition education curricula (e.g., lesson plans, curriculum kits)	97	65
Recipes or cookbooks	92	56
Posters, displays, billboards, or models	92	57
Games	84	32
Staff training manuals/guides	84	89
Newsletter series	78	82
Videos, DVDs, or audiotapes	74	29
Electronic presentations or transparencies	65	78
Calendars	62	24
Television and/or radio advertisements or PSAs	48	61
Self-instructional workbooks or home study	33	33
Computer-based or Internet learning modules	30	53
Kiosks/Information tables	16	80
Number of Respondents: 84		

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Web-based Survey*

In general, implementing agencies had different curricula depending on the age group. Important considerations when choosing a curriculum were whether it was flexible enough to cover a variety of topics and whether it could be tailored to meet the needs of a particular class or individual. On average, implementing agencies used six curricula with a maximum of 15 curricula used. Only about 10 percent used one curriculum only (Exhibit A5-8).

Exhibit 5-12. Most Commonly Reported Curricula Used by Implementing Agencies

Curricula	Percent of IAs
Fight BAC! – The Partnership for Food Safety Education	81%
Eat Smart. Play Hard. – U.S. Department of Agriculture, Food and Nutrition Service	73
Nibbles for Health – U.S. Department of Agriculture, Food and Nutrition Service	47
Community Nutrition Action Kit – U.S. Department of Agriculture, Food and Nutrition Service	42
Eating Right is Basic-Enhanced – Michigan State University Cooperative Extension	41
Other	34
Number of Respondents: 74	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Interviewed implementing agencies felt strongly that they should not “reinvent the wheel,” and that they should use what had been shown to be effective by other States or recommended by FNS. When new materials were created, they were often used to supplement the approved curricula or as part of a comprehensive social marketing campaign. Some States did create new curricula, usually because nothing

existed that met their needs. Most often, however, implementing agencies modified existing materials to meet the needs of a particular audience, such as the elderly, people with low literacy, or people with developmental disabilities.

Recent Materials Created by Implementing Agencies

Arizona: As part of the comprehensive campaign, created ten 30-minute video episodes based on the Bobby B-Well character, mascots, and display boards. Network partners could order materials on-line.

Idaho: Created a "Got Calcium" youth curricula composed of four lessons intended to increase consumption of calcium-rich foods, aimed at both increasing knowledge and behavior change. The curricula also included a physical activity component and a pre-post knowledge and behavior change survey. Evaluation tools were also included. Funds from the University of Idaho (College of Agriculture and Life Sciences) were used to develop and test the materials with 250 school children. Teachers also evaluated the lessons. The curricula included overheads and PowerPoint slides.

In FY 2004, 67 percent of implementing agencies required their subcontractors or local projects to obtain approval for specific nutrition education materials prior to use, especially when the materials were being used for the first time.

Most local projects interviewed cited FNS as being a good source to find approved curricula if necessary. Often the regional offices knew of curricula that had been used and approved in other States, and could direct implementing agencies and local projects to the source of these curricula. Typically, local projects used approved curricula and were required to identify supplementary materials prior to receiving funding. If any new materials were requested during the program year, they would be reviewed and approved by the implementing agency before being used.

In FY 2004, 84 percent of implementing agencies used the Food Stamp Nutrition Connection Website. Implementing agencies used the website to identify or obtain nutrition education materials produced by other FSNE implementing agencies or FNS (98 percent), to view or download information from FNS on FSNE policy (95 percent), and to view information on nutrition topics relevant to FSNE (76 percent). Although the majority of implementing agencies found the website useful, a few found that the site was difficult to navigate.

Occasionally, nutrition educators and local projects made modifications to materials for reasons similar to those cited by the implementing agencies. Most educators said that the materials needed to be more culturally appropriate, more geared towards low-literacy populations, and more interactive. An additional motivation for tailoring materials included the varying availability of foods in certain locales.

While most of these minor modifications or supplements were reviewed by the implementing agency, some local projects had their own local review process. In one community in Arizona, materials were modified to make them more culturally appropriate. A patient education committee at a hospital approved all nutrition education materials after testing the materials with patients. Evaluation tools were used to get feedback and assess effectiveness of the material.

Materials Developed by Nutrition Educators

Sarasota County Extension Nutrition Educators developed the "Go with the Grain" campaign, which was a Sarasota County Extension original. The educators won the 'Go with the Grain' Distinction Award through General Mills Bell Institute of Health and Nutrition. The curriculum was used with all age groups.

University of Massachusetts Extension Nutrition Educators created the 'Fantastic Food Adventures' curriculum for preschoolers. The curriculum incorporated music, movement, arts and crafts, teaching, and discussion. It was developed by adding graphics and recipes and changing the layouts of standard Creative Packets materials.

Languages Used in FSNE Activities

Only three implementing agencies reported using *only* English in their materials or activities. Almost all agencies reported using two or more languages, with 28 percent of implementing agencies reporting three or more languages other than English, and one implementing agency reporting 12 languages.

Ninety percent of implementing agencies used materials or conducted activities in Spanish. Approximately 13 percent of agencies used materials or conducted activities in Vietnamese, and 10 percent in Hmong. Other languages were much less frequently used (Exhibit A5-9).

FSNE as a Benefit of the Food Stamp Program

There is a clear guidance from FNS that FSNE providers should identify FSNE as a benefit of participating in the Food Stamp Program. At a minimum, FNS requires FSNE implementing agencies to use standard language on program materials to acknowledge the FSP as a source of funds. During interviews, implementing agencies described how the standard language required by FNS was included on all materials, and how they felt that they had met the requirement of promoting FSNE as a part of the FSP.

While almost all State agencies (94 percent) *viewed* FSNE as one of the benefits of a Food Stamp Program, a smaller percent (66 percent) actively *promoted* FSNE as a Food Stamp Program benefit (Exhibit A5-10). Similarly, 88 percent of implementing agencies *viewed* FSNE as one of the benefits of FSP, but somewhat fewer *identified* it to clients as a FSP benefit (78 percent) (Exhibit A5-11). During interviews, some implementing agencies and local projects described their hesitancy to promote FSNE as a part of the FSP. There were fears that associating nutrition education with the FSP would be a barrier to client participation, because in their mind the association might be a negative one to clients. In fact, many implementing agencies did not discuss the link with the FSP except on printed materials because the perception was that the FSNE audience might be sensitive to being associated with the FSP, whether they were recipients or not.

All stakeholders—implementing agencies, local projects, State agency, and partners—were quick to note that FSNE participants saw the local project or subcontractor as the provider of nutrition education rather than FSP within the larger implementing agency and that they may not have understood the link between FSNE and the Food Stamp Program. In Hawaii, the implementing agency affirmed that "while we use the standard language, the participants believe that the nutrition education is being provided by the University

and not the Food Stamp Program.” Similarly, respondents in California suggested that “while all the materials and videos have the food stamp tag line, the clients do not see this program as part of the Food Stamp Program; they see it as a Department of Health or a University of California, Davis program.”

This hesitancy towards closely tying FSNE to the FSP resulted in the perception by State agencies that participants were probably not aware of the link. Only 4 percent of State agencies believed that FSNE participants “very much recognized FSNE as a FSP benefit” (Exhibit A5-12). Instead they were more likely to think that FSNE participants “somewhat recognized” FSNE as a benefit (45 percent), had little recognition of FSNE as a benefit (35 percent), or had no recognition of FSNE as a FSP benefit (10 percent).

Gaps in Service

In general, implementing agencies, local projects, nutrition educators, and FSNE partners felt that they were targeting populations most in need of services, and, for the most part, reaching them. However, during site visits, implementing agencies and local projects/subcontractors reported gaps in services. The reasons for the gaps they identified are described below.

Insufficient Non-Federal Funds

In some instances, gaps in service occurred when FSNE entities encountered difficulty in obtaining non-Federal funds. Potential partnerships were rejected because the partner agency was already using its funds to reimburse costs for another Federal program. In addition, an implementing agency or local project was sometimes under the impression that the type of private organization was not acceptable within the FSNE guidelines. Implementing agencies cited faith-based organizations, private shelters, and food pantries as organizations that were considered unacceptable within the FSNE guidelines. Local projects described that at times they would work with these partners and not claim reimbursement; however, the number of classes, or extent of nutrition education provided, was usually limited due to budget constraints. They described the careful balance of focusing on finding sources for non-Federal funds and reaching the target audience.

Difficulties in Serving Target Populations

There were also inherent challenges of serving segments of the target population, namely working adults, school children, older adults, and certain cultural groups. The reasons for the difficulties varied. However, respondents reported that meeting the audience in their natural, or convenient environment was most effective in addressing the barriers.

Respondents reported it was difficult to recruit working adults into a class series. Balancing work and home often meant that nutrition education classes fell low on the list of priorities. Local projects that were successful in serving difficult to reach populations partnered with an agency that already had an available audience, such as parent meetings in Head Start. Parents seemed to value the Head Start learning opportunities and were likely to participate in the special series on nutrition education provided by FSNE staff.

Similarly, reaching seniors was a challenge. Seniors with limited income often depended on congregate meal sites. This is an opportunity for FSNE nutrition educators to provide a series of classes. However, seniors who did not access such sites were more challenging to serve.

The challenges in reaching school aged children were somewhat different. Finding predominantly low-income children in schools was easy; engaging teachers and principals was the challenge. The pressure to meet teaching performance standards and to have students test well often meant that nutrition education was hard to fit into school schedules, as it was considered “nice but not necessary.” Furthermore, local projects explained that many teachers found the paperwork associated with documenting costs reimbursed by non-Federal funds too burdensome. FSNE projects that were most successful were the ones that made the paperwork as short as possible or integrated nutrition education with the existing curricula. Perhaps as important are the reports by local projects that the long-standing, positive relationship built between schools and FSNE staff was critical to implementation.

CHAPTER VI. FSNE PROGRAM MANAGEMENT AND EVALUATION

Successful implementation of FSNE services requires a wide range of management and monitoring activities including: provision of an adequate number of personnel with appropriate qualifications as well as educational facilities and materials, securing needed funds and monitoring expenditures, tracking the educational activities conducted and the participation rates, and collecting and analyzing data to evaluate the quality of program implementation and impact. This chapter presents the study findings related to topics of FSNE management with a special focus on:

- FSNE staff qualifications and training,
- Educational services monitoring and reporting,
- Financial management, and
- Program evaluation.

CHAPTER HIGHLIGHTS

- The majority (70 percent) of FSNE staff in FY 2004 had a Bachelor's degree or higher. However, in general, nutritionists/dietitians and staff with a Master's degree (totaling 40 percent) typically supervised nutrition educators rather than conducting educational activities, and the minimum educational requirement for nutrition educators was a high school diploma or GED. This suggests that the majority of nutrition education activities were conducted by staff with a Bachelor's degree or less (constituting 59 percent of FSNE service delivery staff).
- To monitor implementing agencies' nutrition education activities, State agencies relied on annual FSNE reports and other quantitative data. In addition, 21 State agencies reported conducting on-site reviews of local projects, and 21 State agencies (not necessarily the same 21 agencies) reported interviewing the implementing agency staff as a way of monitoring.
- About half of implementing agencies with local projects or subcontractors conducted internal reviews or audits of FSNE spending by their local projects or subcontractors, mainly to ensure that nonallowable expenditures were not included in claims for reimbursement.
- Three-quarters (74 percent) of implementing agencies reported that they conducted some type of outcome evaluation of FSNE services, although the respondents did not clearly differentiate between program process monitoring and outcome evaluation.
- Of implementing agencies that conducted outcome evaluations, a majority reported using in-person client interviews or surveys to collect data – typically self-reported, pre-post data, including dietary recalls. Fifty percent of those agencies reported positive behavior changes.

Staff Qualifications and Training

Education and Qualifications of FSNE Staff

The fundamental goal of FSNE is to design and deliver learning experiences that facilitate the voluntary adoption of healthy eating and other nutrition-related behaviors among low-income individuals with limited resources. Essential for achieving this goal are personnel with appropriate skills and expertise to deliver and manage the planned educational services. The survey data indicated that, in FY 2004, a large proportion of FSNE staff possessed a Bachelor's or graduate degree.

On average, 19 percent of service delivery staff¹⁸ were registered dietitians (RDs) and another 21 percent held a Master's degree or higher (but not RD certification) (Exhibit A6-1). Thus, at least 40 percent of staff had education beyond the Bachelor's degree or were RDs. Another 29 percent held a Bachelor's degree but were not RDs; although some of these staff may have had some formal nutrition training (e.g., graduate courses in nutrition).¹⁹ At the other end of the educational spectrum, 30 percent of service delivery staff had a high school diploma, GED, or some college education but not a Bachelor's degree.

Generally, the implementing agencies interviewed indicated that nutrition educator supervisors and program directors were required to have a graduate degree, but the minimum requirement for nutrition educators was a high school degree or GED, although most implementing agencies required nutrition educators to complete some kind of training (examples are discussed in the next section). The agency staff explained that experience working with the public and a basic understanding of nutrition principles were the most important qualifications for FSNE service delivery staff.

Most of the local projects interviewed also reported that they used nutritionists/dietitians for providing general program oversight and supervising paraprofessionals (defined as staff with less than a Bachelor's degree). Paraprofessionals, who constituted 30 percent of FSNE service delivery staff, were mostly assigned to conduct nutrition education activities. Information from all these sources suggests that, while some of the nutrition educators may be registered dietitians or have a Master's degree, most nutrition educators are paraprofessionals or college graduates with some training related to nutrition (these groups constitute 59 percent of the service delivery staff). They are supervised by registered dietitians and/or staff with a Master's degree or higher.

One of the reasons cited for the local projects' reliance on using paraprofessionals as nutrition educators was that professionals are hard to recruit in remote areas and hard to retain in areas with more alternative job opportunities. Another rationale for specifically assigning paraprofessionals was to implement a peer-counseling model of nutrition education. For example, the University of Minnesota FSNE staff strongly believed that this is the most effective way to work with FSNE participants to achieve behavior change.

In terms of specialized instructional skills, 65 percent (of 26 implementing agencies interviewed) reported using bilingual staff in providing nutrition education. However, about one-half of these implementing

¹⁸ "Service delivery staff" refers to personnel responsible for tasks such as education of participants, program planning and evaluation, and material development, but excluding personnel who performed only administrative tasks.

¹⁹ Data are not available regarding whether the staff with a Master's degree or a Bachelor's degree (but not RDs) had any nutrition-related education or training.

agencies explained that recruitment of bilingual staff with nutrition education qualifications was challenging – mostly due to the scarcity of bilingual applicants with an advanced degree or relevant training in nutrition.

Of the 62 local projects interviewed, they were evenly split on whether or not they used volunteers. Those that used volunteers generally assigned them to assist nutrition educators (48 percent of projects using volunteers) and/or to perform administrative support tasks (42 percent). Among these local projects, the most common sources for recruiting volunteers were local colleges and university health programs, which sometimes placed students as interns. Volunteers were also recruited through general word of mouth in the community.

In general, implementing agencies reported that staff turnover among their FSNE staff or at the local project level was not a major problem. However, about one-third of 17 implementing agencies responding to this interview question reported high staff turnover at the local level. Further, about one-half of these responding agencies cited budget constraints, low salary rates, or hiring freezes as barriers to recruiting and hiring needed staff.

Staff Training

Training opportunities for FSNE delivery staff were widespread. Of all implementing agencies surveyed, 83 percent reported that they routinely provided training. These agencies reported high rates of training offered to new professional staff (75 percent of those offering training routinely), current professional staff (86 percent), and current paraprofessional staff (81 percent) (Exhibit A6-2). The training was provided to staff at the implementing agencies as well as local projects and subcontractors.

Most local projects interviewed Stated that mandatory training was provided to their staff on a regular schedule (annual, biannual, quarterly, or monthly). Typically, training was conducted by the implementing agency and covered a wide range of topics including general nutrition education topics, how to use a specific curriculum, and/or program administrative procedures. Training topics were selected based on decisions by the implementing agency, requests and suggestions from the local staff, or results of the local project's annual evaluations.

Among the 21 local projects interviewed that hired new staff in FY 2004, the majority (57 percent) provided mandatory training for the new staff. Training for new local staff was primarily conducted by the local project director, and it focused on educational curriculum and program administrative procedures. Local project staff were uniformly satisfied with the amount of training their staff received. Most local agencies interviewed (81 percent) did not have certification programs available for their paraprofessional staff.

Nearly half of the implementing agencies (45 percent) surveyed reported training staff of agencies other than their local projects and subcontractors. Among the agencies that trained external organization staff, the most common recipients of such training were staff at public schools (69 percent) and childcare or preschool programs (63 percent) serving as local FSNE partners, and the training focused on FSNE administrative procedures. In general, local partners interviewed said that they did not receive training from the local project or the implementing agency. This may be due to the fact that most local projects had trained their own staff to conduct nutrition education, rather than using their partner organizations to

deliver nutrition education. The partners who received training (mostly addressing administrative issues) were unanimously satisfied with the training.

Monitoring and Reporting of FSNE Services

Successful implementation of FSNE services requires that State agencies and implementing agencies monitor and ensure the appropriate and effective execution of the approved plans. This monitoring needs to address the following types of issues through periodic reports and other communications:

- Is FSNE being delivered in compliance with Federal and State requirements and FY 2004 FSNE Plan Guidance regarding target audiences and the content of educational services?
- Do educational activities delivered focus on high-priority health and nutrition issues?
- Do FSNE providers have sufficient and qualified staff and appropriate educational facilities?
- To what extent are the planned services implemented?
- What are the impacts of services on participants?

In addition, as part of the administrative requirements to receive reimbursement for FSNE activities, State food stamp agencies are required to report their allowable nutrition education expenditures to FNS on a quarterly basis. The State agencies prepare these reports using information from implementing agencies, three-quarters of which rely on data from local projects or subcontractors. Financial reporting includes both the amounts of expenditures and the supporting documentation that establishes that the expenditures are allowable and reasonable. Data collected in this study suggest general areas of responsibility for State agencies, implementing agencies, and local projects in the overall FSNE management structure as shown in Exhibit 6-1. While highly simplified, this schematic portrays in a broad sweep, the respective roles that key FSNE organizations play in the overall FSNE management and program monitoring efforts.

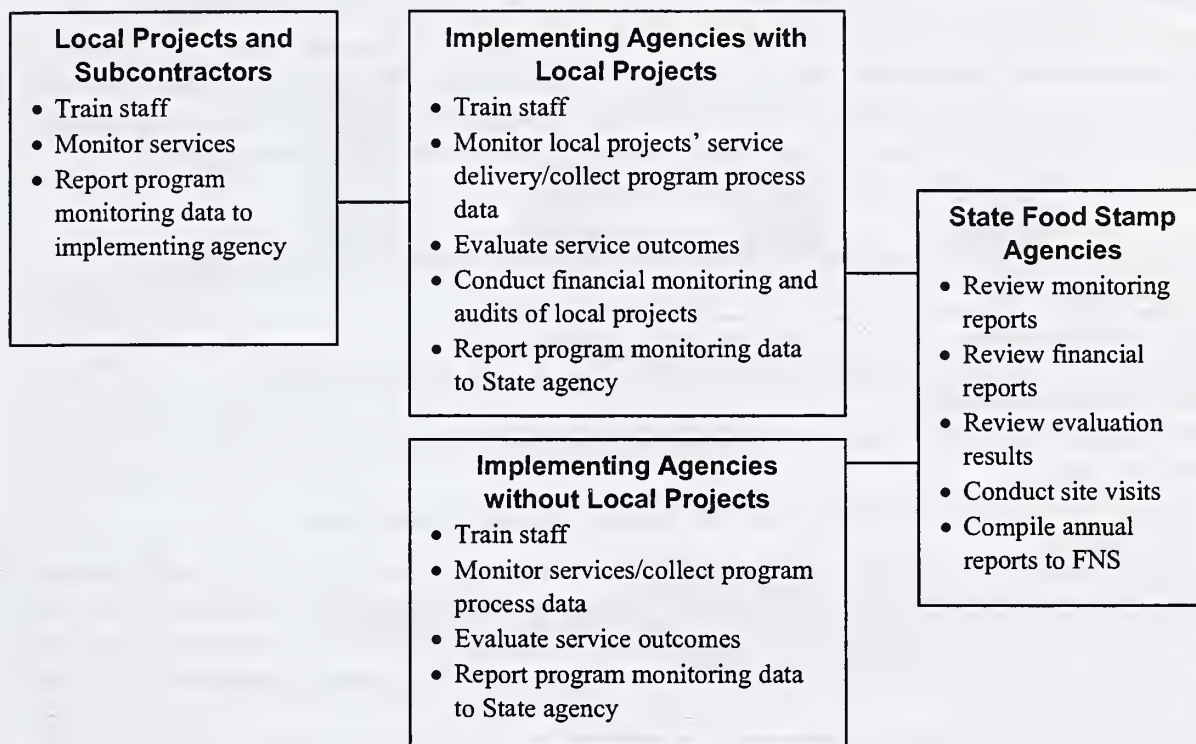
Monitoring the Implementation of FSNE Activities

In FY 2004, the only FNS reporting requirements in place were the required elements for the annual FSNE Year End Report, which included: name of project or campaign, geographical areas reached, type and number of delivery sites, duration of social marketing campaigns, description of the target audience, primary nutrition education methods, core elements covered and key messages, type of evaluation (formative, process or impact), and number of direct and indirect contacts with FSP participants/households and with all persons/households, by project and State total.²⁰

In FY 2004, all States collected some data on the number of clients served by FSNE, but the methods by which they tracked, recorded, and reported this information varied. Further, the type of FSNE activity data collected varied across different service delivery methods—direct education, indirect education, and social marketing. There was also considerable variability within each delivery method.

²⁰ These were the required elements for the FY 2004 final report specified in the FY 2005 FSNE Plan Guidance (March 2004).

Exhibit 6-1. FSNE Program Management Functions Performed by State Agencies, Implementing Agencies, and Local Projects/Subcontractors



For direct education initiatives, the most common way of reporting participation was to count the number of individuals who received FSNE service at least once during a reporting period regardless of how many times or classes the person participated (unduplicated counting). Three-quarters of implementing agencies responding to the survey (representing 46 States) counted the unduplicated number of persons attending classes or participating in one-on-one educational activities. Sixty-one percent (in 38 States) counted the number of persons completing a course or series of lessons (Exhibit A6-3). Only 43 percent of implementing agencies in 28 States provided the number of contacts or duplicate counts of persons attending multiple classes or sessions. These responses suggest that most, but not all, implementing agencies kept records in a way that allowed reporting of number of individual participants, rather than the contact counts that were requested by the FNS Plan Guidance for the FY 2004 FSNE final report.

Implementing agencies also used a variety of ways of quantifying the delivery of indirect education, and tended to report their indirect education activities using multiple measures. The most common method was counting the number of items (flyers, newsletters, etc.) distributed (73 percent of implementing agencies in 42 States, Exhibit A6-4). For reporting FSNE events, such as one-time distribution of nutrition education materials at a health fair or a community event, counting the number of events was more common (61 percent of agencies in 40 States) than assessing the number of participants at those events (45 percent of agencies in 32 States). Other commonly used methods associated with indirect education services were: counting mailings (46 percent), counting the number of times messages were delivered through methods such as distribution of flyers in food stamp offices (39 percent), and assessing the number of exposures to posters or placards (31 percent).

Among the implementing agencies using social marketing, 73 percent (in 16 States) collected some type of data on the reach of the marketing campaign, while 27 percent (in 6 States) did not (Exhibit 6-2). Implementing agencies with social marketing campaigns measured their reach in various ways, and 68 percent (in 12 States) used more than method in various combinations. Fifty-eight percent (in 15 States) tracked the number of times social marketing messages were delivered; 50 percent (in 12 States) recorded demographics of populations exposed to social marketing messages through media estimates of reach and placement. A substantial minority (42 percent in 10 States) collected data from individuals to estimate the number who were aware of the social marketing messages.

Exhibit 6-2. Information Collected Regarding Social Marketing Campaigns

Type of Information	Percent of IAs
Tracked the number of times social marketing messages were delivered	58%
Assessed demographics of populations exposed to social marketing messages through media estimates of reach and placement	50
Collected data from individuals to estimate the number who were aware of the social marketing message(s)	42
Assessed the percentage of the target population reached by media used to deliver social marketing messages	38
Assessed geographic reach of social marketing messages	35
Tracked the number of individuals who responded to a specific social marketing message	31
No information on FSNE implementation was collected	27
Number of Respondents: 26	

Note: One or more responses were given by each respondent.

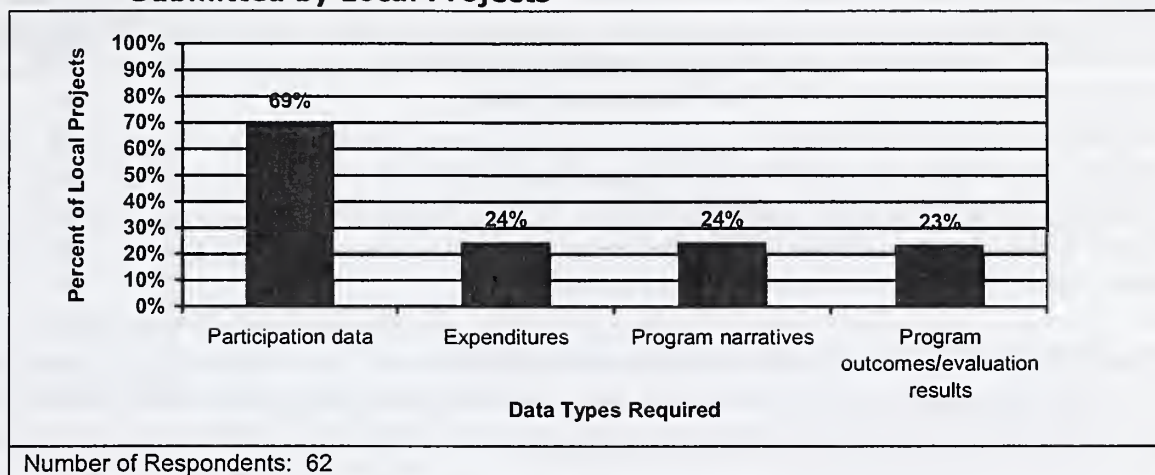
Source: *Implementing Agency Survey*

Reporting of FSNE Activities and Spending by Local Agencies and Subcontractors

The majority (80 percent) of local projects interviewed indicated that their program monitoring requirements were specified by their implementing agency, most commonly in the form of quarterly written reports (one-half of local projects interviewed). One-third of local projects said that they submitted monthly monitoring reports to implementing agencies. In addition to these reports, 40 percent of local projects received site visits from their implementing agencies.

Reports submitted by local agencies to implementing agencies commonly included participation data (69 percent of local projects interviewed) as well as expenditures (24 percent), program narratives (24 percent), and evaluation results (23 percent) (Exhibit 6-3). Fifty-two percent of local projects interviewed indicated that their implementing agencies specified certain performance criteria such as certain levels of direct and indirect participant contacts. Implementing agencies also required linking financial reporting of staff hours and travel costs for educational activities (e.g., number of classes held). Most local projects reported that they had no problems meeting the reporting requirements set by the implementing agency.

Exhibit 6-3. Types of Data Required by Implementing Agencies in Reports Submitted by Local Projects



Note: One or more responses were given by each respondent.

Source: Local Project Interviews

In addition, about one-third of local projects interviewed reported that they had some type of performance review or evaluation of FSNE service delivery staff. Most of these were through a formal performance review process, though some used a combination of formal and informal processes, including teaching observations and feedback from partner agencies.

State Agency Role in Monitoring FSNE Activities

There is a general requirement for State agencies to monitor implementing agencies, and FNS requires a final Year End report on an annual basis in a specific format. Many State agencies have expanded their monitoring of FSNE activities by requiring implementing agencies to submit quarterly progress reports and conducting site visits. The progress reports describe activities directed at meeting the State-specific FSNE goals and objectives as well as expenses to assure that FSNE activities are being conducted in accordance with the approved plan. These reports are prepared using a format agreed to by the State agency and the implementing agency.

Most (85 percent, 41 States) of the implementing agencies surveyed reported that State agencies reviewed their final FSNE reports. A similar percentage (80 percent, 36 States) indicated that State agencies reviewed quantitative data from the implementing agency (e.g., interim progress indicators) in addition to the final FSNE reports on FSNE operations (Exhibit 6-4). In addition, some implementing agencies reported receiving active oversight by the State agency during the course of the year. The oversight involved State agencies conducting on-site reviews of local FSNE projects (48 percent, 21 States) and/or State agencies interviewing the implementing agency staff (48 percent, 21 States). A similar percentage of implementing agencies reported State agency holding regular meetings with the implementing agency (46 percent, 25 States) and reviewing qualitative data from the implementing agency (40 percent, 22 States).

Exhibit 6-4. State Food Stamp Agency Monitoring of Implementing Agencies

Monitoring Methods	Percent of IAs
Review of final FSNE reports prepared by the implementing agency for FNS	85%
Review of quantitative data supplied by FSNE implementing agency	80
On-site reviews of local FSNE projects	48
Conducted interviews with the implementing agency coordinator or other project staff	48
Held regular meetings with implementing agency staff	46
Review of qualitative data supplied by FSNE implementing agency	40
Review of results or outcomes of social marketing campaigns	29
Other	23
Not applicable (SFSA did not monitor implementing agency activities)	9
Number of Respondents: 80	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

On the other hand, State agency interview data suggested that, in as many as half of the States, monitoring of FSNE activities is mostly based on reviewing the financial reports sent by implementing agencies. Site visits were noted as being the most effective monitoring tool, and some State agencies that did not conduct site visits expressed that they would like to do so in the future. On the other hand, State agencies interviewed generally reported that they were satisfied with the information received from implementing agencies.

Interview responses based on a sample of 28 implementing agencies also suggested that the extent of ongoing monitoring by State agencies varied across States. Over half of these implementing agencies indicated some State agency monitoring via progress reports. Some State agencies were proactive in working with implementing agencies, using informal contacts by phone and e-mail as a tool for staying in touch with implementing agencies. On the other hand, 11 percent of implementing agencies did not know what monitoring the State agency did.

Financial Management

The implementing agencies were at the center of the FSNE financial management process. Commonly, implementing agency staff responsible for monitoring FSNE spending were project directors/principal investigators and finance managers, contracts and grants administrators, or accountants. Most implementing agencies monitored FSNE expenditures through regular reporting from their local projects and submitting invoices to the State agency where the information was further monitored.

Monitoring of Local Project FSNE Spending

Financial audits of FSNE spending were conducted for a large majority of local projects in FY 2004. In the survey, 53 percent of implementing agencies with local projects or subcontractors reported that FSNE spending at the local level was reviewed or audited by the implementing agency staff (these agencies represented 28 States) (Exhibit A6-5). Ten percent of implementing agencies commissioned an independent auditor (in six States), and another 10 percent of agencies reported that their local projects or

subcontractors commissioned independent audits of the local FSNE spending (in six States). Thus, 20 percent of implementing agencies reported that their local projects had independent audits. These figures may underestimate the actual proportion of local projects and subcontractors with audits, because implementing agencies may not have been aware of all such audits.

Based on interviews of 12 implementing agencies that conducted local project audits, these audits were initiated by implementing agencies or required by the State agency and focused primarily on ensuring that unallowable expenditures were not included in claims for reimbursement. Seven out of ten implementing agencies that described their local audits in FY 2004 reported that they found few or no problems.

Local project managers interviewed said that implementing agencies generally did not require local projects to obtain prior review and approval for FSNE expenditures. Projects that were subject to prior review of spending were required to get approval for expenditures over a specified amount, and/or specific items in their budget.²¹ However, local projects subject to this kind of review reported that it was easy to provide the requested information.

Seventy percent of local projects interviewed said that expenses for items such as travel, materials, and salary, and non-Federal funds contributed by partners were monitored monthly either by local projects themselves (63 percent) and/or by their implementing agencies (40 percent). While 35 percent of local projects interviewed reported no problems with the financial monitoring process, 25 percent said getting the information needed (e.g., from local partners) to report in a timely manner was an ongoing challenge.

Financial Monitoring at Implementing Agencies

Nearly two-thirds of the implementing agencies (63 percent) had internal reports of agency-wide expenses in addition to their invoices to State agencies. At least one-third of the implementing agencies also reported using one or more of the following additional methods to monitor FSNE expenditures and funds remaining in their budgets: internal reports of local project/subcontractor expenses, meetings of implementing agency personnel, prior approval of financial commitments (contracts, equipment purchases, etc.), agency-wide spending forecasts, and meetings with local project/subcontractor managers (Exhibit 6-5). Only 10 percent of the implementing agencies reported relying solely on invoices, audits, or fiscal reviews to monitor spending and manage budgets.

²¹ We did not obtain data on the specific level of spending that requires prior review and approval by the implementing agencies.

Exhibit 6-5. Additional Methods of Fiscal Monitoring by Implementing Agencies

Method	Percent of IAs
Internal reports of agency-wide expenses	63%
Internal reports of local project/subcontractor expenses	45
Meetings of central implementing agency personnel	43
Prior approval of financial commitments of local projects/subcontractors	40
Agency-wide forecasts of actual spending	35
Meetings with local project or subcontractor managers	35
Local project or subcontractor forecast of actual spending	27
None of the above (relied only on invoices and audits/reviews)	10
Number of Respondents: 84	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Financial Monitoring of Implementing Agencies by State Agencies

Fifty percent of implementing agencies submitted invoices or similar requests for reimbursement to the State agency at least quarterly, and about one-third (32 percent) invoiced monthly. The remainder invoiced less frequently (Exhibit A6-6). Over half of the implementing agencies reported providing information on each of the following types of expenditures in their invoices to the State agency: total personnel compensation, travel expenses, indirect costs, equipment and supplies, nutrition education materials, and purchased services (Exhibit A6-7). Non-Federal contributions were less commonly reported in invoices, with 45 percent reporting in-kind contributions and 20 percent reporting cash contributions. About one-third (35 percent) reported providing information on building or space expenses. Fewer than 20 percent of the implementing agencies reported including narrative information or staff hours as part of their invoices.

Data from the State agency survey also indicated that almost all State agencies reviewed implementing agencies' invoices as a tool for financial monitoring. Further, in FY 2004, about half of the States reviewed other financial reports submitted by implementing agencies, and a third of the States met with implementing agency staff to discuss FSNE spending (Exhibit A6-8). In addition, 19 percent of States conducted a review or audit of implementing agency's FSNE financial records; while 23 percent received reports from internal audits conducted by implementing agencies, and one State commissioned an independent audit of its implementing agency. Many States (31 percent) described other methods through which they received formal review or audit information on FSNE spending including general State audits and general audits by implementing agencies' parent organization (e.g., universities) (Exhibit A6-9). Forty-four percent of State agencies reported that they collected no formal financial review or audit reports from their implementing agencies in FY 2004.

Almost every State agency interviewed reported receiving all information on expenditures that it requested from the implementing agency. Most State agencies requested progress reports and invoices at least quarterly from implementing agencies and felt that implementing agencies were timely in getting these data to the State agency. Almost every State agency reported that implementing agency operations and financial management seemed to be running smoothly. State agencies also seemed to indicate that the procedures they used for monitoring implementing agency expenditures worked well.

Financial Oversight Required by the Implementing Agency's "Parent" Organization

An interesting challenge encountered by implementing agencies in land grant universities was the financial oversight required by the university administration. In particular, implementing agencies reported having problems buying food to use in FSNE activities and having to explain and justify food purchases, as State universities restrict food purchases for hospitality purposes. For example, one implementing agency wanted to buy large quantities of shortening to make "fat tubes" in order to visually represent the amount of fat in different types of food. The university repeatedly denied the purchase of shortening, saying that food was not allowed for hospitality. Eventually the purchase was approved, but the implementing agency noted that it was a major obstacle reflecting a lack of understanding among the university financial authorities about FSNE and nutrition education in general. Other land grant university-based implementing agencies reported similar experiences.

Strengths and Challenges of Monitoring Process

Overall, most implementing agencies felt that their monitoring system allowed them to meet State agency requirements. Strengths of the monitoring process cited by implementing agencies included the use of an online monitoring and reporting system and the ability to produce multiple types of reports on participation rates and program operations. A few Cooperative Extension Service projects used electronic financial systems put in place by the university. Weaknesses cited were: significant time and/or staff investment required in the monitoring process, lack of an automated or electronic monitoring system, monitoring tools that produced inadequate or confusing reports, and lengthy internal approval processes. For example, some Cooperative Extension implementing agencies felt that complying with the approval processes imposed by the university was cumbersome and ineffective. Implementing agency directors described problems stemming from the fact that university administrative staff did not understand the goals of FSNE and therefore would reject spending for FSNE that should have been approved.

Evaluations of FSNE Services

Well-designed, systematic evaluations are needed to assure the accountability of FSNE and inform future planning and policy refinement. The FY 2004 FSNE Plan Guidance stressed the importance of evaluating the effectiveness of nutrition education, referring to three types of research activities that are appropriate for achieving these evaluation objectives: 1) formative evaluations, such as pilot testing of educational materials and curricula, to ensure the best fit between the services offered and the educational needs of the target audience; 2) implementation process evaluations to ensure that educational services are implemented as planned; and 3) outcome or impact evaluations to assess the changes in participant knowledge and behaviors after receiving nutrition education services (outcome) and to determine the extent to which such changes can be attributed to the services received (impact).

The surveys and interviews for this study collected data on the nature, extent, and results of evaluations performed in FY 2004. The survey questions focused on the implementation process and outcome evaluations, and asked respondents to describe in general terms the implementing agencies' involvement in FSNE evaluations in FY 2004. The interview questions were intended to collect more in-depth data

regarding research designs and measures used, study findings, and how the findings were applied to ongoing educational services. In this section, we present the data as they were reported by FSNE agencies, beginning with some caveats.

In the interviews, detailed information about outcome evaluations of FSNE services was scarce and at times seemed at odds with data obtained from the surveys. Many implementing agencies and local projects stated that they conducted outcome evaluations, though most respondents did not seem to differentiate between program process monitoring and outcome evaluation data collection. For example, projects used data on frequency of attendance in FSNE activities as the primary participant outcome measure with little further evidence of behavior and/or knowledge change to show that their program was successful. Measures of “participant outcomes” mostly consisted of program participants’ self-reported data on behavior change (e.g., dietary practices), and/or satisfaction with the program. Some respondents at both the implementing agency and local project levels acknowledged the scarcity of outcome and impact evaluation data. They explained that they did not have enough resources (including staff time, money, and training) to adequately evaluate program outcomes.

Formative Evaluation

Seventy-one percent of implementing agencies surveyed reported that they tested some or all of their educational messages, using methods such as focus groups and interviews of food stamp recipients and other low-income groups. Additionally, focus groups were frequently used to test comprehension and language of materials. An example from interviews with the Arizona implementing agency is presented below.

Example of Formative Evaluations

Arizona: In a project that served a large number of participants representing many different dialects of Spanish, materials were modified by a bilingual nutrition educator to make them more culturally appropriate. A local project (a hospital) had a Patient Education Committee that tested all the materials with patients before approving each nutrition education material used for FSNE. In addition, evaluation tools were used to get participant feedback and assess effectiveness of the materials.

Nutrition educators further explained that, even when no formal method for assessing materials’ effectiveness was in place, anecdotal feedback from participants provided them with useful information on the materials being used for FSNE.

Implementation Process Evaluations

Data from process evaluations were limited to basic frequency counts of activities, educational materials, and participants. How these data are collected and reported are discussed in earlier section of this chapter, under “Monitoring and Reporting of FSNE Services.”

Descriptions of evaluation activities conducted by local projects made references to various activities without clear distinction about the type of evaluation. Most local projects collected data on the extent of

participation, participant demographics, reach of message, participants' behavior change (generally measured with a pre- and post-test), and participant feedback (e.g., satisfaction) on lessons taught (Exhibit A6-10). Local projects reported collecting some type of data during every class, which may represent mostly implementation process data.

Outcome Evaluations

On the web survey, the majority of implementing agencies surveyed reported that they were involved in outcome evaluations of many (45 percent) or some (29 percent) FSNE services. These were delivered either at the implementing agency or the local project level in FY 2004.²² The remainder (26 percent) did not report conducting any outcome evaluations. Over half (67 percent) of implementing agencies indicated that they were involved substantially in outcome evaluations, either providing significant support and technical assistance (37 percent) to local projects or conducting the outcome evaluations themselves (30 percent) (Exhibit A6-11).

Implementing agencies indicated that the availability of resources, including adequate time and expertise of staff (49 percent) and funds (34 percent), affected decisions about which services were evaluated (Exhibit A6-12). Only a few agencies mentioned aspects of the delivery and policies, such as new target audiences and initiatives introduced, as the impetus and focus for outcome evaluations.

Based on interviews of 17 implementing agencies that described their outcome evaluations, it appears that participant outcome evaluations typically focused on both behavior change and knowledge change (Exhibit 6-6). Across various types of services (or methods of service delivery) conducted, the majority of implementing agencies (67 percent) indicated that education classes were evaluated. The most useful study results, according to the interview respondents, were data on behavior change (outcomes) and program utilization (e.g., process measures of the number of clients participating, the number of repeat contacts, and the number of FSNE events held).

Of 26 implementing agencies that described their outcome evaluations in interviews, 77 percent indicated that their outcome evaluations of FSNE services were not conducted by an outside evaluator. It is possible that some of the internal evaluations may have been conducted by a faculty member who is not directing the nutrition education, thus assuring a degree of objectivity. Further, information provided by interview respondents was also scanty regarding the data collection measures, timing, and procedures. Seventy-six percent of implementing agencies reported using in-person client interviews or surveys to collect data for outcome evaluations – typically self-report, and pre-post data, including dietary recalls. For example, the University of Georgia implementing agency developed a questionnaire to measure participants' knowledge, behavior, and attitude change as a result of their whole grain promotion campaign. Similarly, an implementing agency in Massachusetts collected data on clients' readiness for change focusing on physical activity, fruit and vegetable consumption, and consumption of high-fat foods. Another measure of educational outcomes was to document "plate waste" in school cafeterias and collecting anecdotal evidence from teachers regarding their students' eating habits.

²² In the survey instrument, outcome evaluations were defined as "assessment of changes in client behavior, environmental changes, or other effects of FSNE."

Exhibit 6-6. Descriptions of Outcome Evaluations Based on Implementing Agency Interviews

	Percent of IAs
Focus of Outcome Evaluations	
Behavior change	65%
Knowledge change	30
Awareness of messages	10
Attitude change	10
Diet recall	10
Client reading level	5
Staff performance	5
Appropriateness of materials	5
Number of Respondents: 21	
What services were evaluated?	
Education classes	67%
All services	17
Train the trainer	11
Community-based programs	11
School-based programs	6
Senior programs	6
Other	11
Number of Respondents: 18	
What methods were used?	
In-person client interviews/surveys	76%
In-person partner interviews/surveys	18
Staff observations	12
Field observations	12
Interactive computer kiosks	0
Other	12
Number of Respondents: 17	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Interviews*

Example of a Systematic Outcome Evaluation

The University of Georgia, Department of Food and Nutrition conducted an evaluation of its curriculum on whole-grain foods for senior citizens in FY 2004. The goal of the curriculum was to improve intakes of whole-grain foods and related behaviors. The intervention and evaluation were conducted with 84 congregate meal participants in several senior centers. Pre-test and post-test questionnaires were developed specifically for this project and administered face-to-face by trained interviewers. The evaluation found that, after the intervention, participants were significantly more likely to demonstrate knowledge of how to identify whole-grain foods, and that their reported intakes of certain whole-grain foods increased significantly, from 5.8 to 6.9 servings per week. The results were published in the *Journal of Nutrition for the Elderly*.²³

FSNE Staff's Assessment of Evaluations

Forty-three percent of implementing agencies surveyed described factors, such as difficulty in designing evaluation instruments and accessing existing data that can be used as outcome indicators, that were impediments for conducting outcome evaluations. The largest barrier to data collection cited by local projects was a lack of resources (either money or time). Areas for improvement were noted including: better trained data collectors and more comprehensive data collection (either collecting more data, or collecting more demographic data that would allow for more stratification). Interview respondents stated that they needed effective instruments that they could use to better prove the success of their program.

Nonetheless, 50 percent of implementing agencies interviewed believed that their outcome evaluations found positive behavior change among clients, such as improvements in dietary practices (Exhibit A6-13), and 66 percent felt that their data were reliable. Implementing agencies used these data primarily to satisfy their State agency's program monitoring reporting requirements. A majority of implementing agencies interviewed also reported that they used the results of outcome evaluations to improve the quality and delivery of nutrition education and FSNE-related policies and planning.

²³ Ellis, J., M.A. Johnson, J.G. Fischer, and J.L. Hargrove (2005). Nutrition and Health Education Intervention for Whole Grain Foods in the Georgia Older Americans Nutrition Program. *Journal of Nutrition for the Elderly*, Vol. 24(3) 2005, pp. 67-83.

CHAPTER VII. BUDGETS AND OUTLAYS

This chapter presents information on FY 2004 FSNE budgets and outlays of funds, both at the implementing agency level and by States. Financial data provide a perspective on the scale of FSNE and a “common denominator” for comparing the level of activity across States. For this study, State-level budget and outlay information were obtained from existing FNS databases, but States do not report detail for their implementing agencies to FNS. To fill this gap, the implementing agency survey collected data on the sources and uses of funds in FY 2004. The interviews provided further insights into how FSNE was funded and what factors affected levels of spending at the local and implementing agency level.

CHAPTER HIGHLIGHTS

- Federal outlays for FSNE totaled \$147 million in FY 2004, while non-Federal outlays totaled \$148 million.
- Total FSNE outlays ranged from about \$20,000 in Hawaii to \$65 million in California, with a median State total of \$3.5 million. The ten States with the most FSNE outlays spent 62 percent of the total.
- On average across the Nation, total FSNE spending was \$12.35 per FSP participant.
- States varied considerably in the level of FSNE spending relative to the size of the target population. Among the States, the median FSNE outlay was \$11.21 per FSP participant, with the middle 50 percent of States spending between \$5.83 and \$19.40 per FSP participant.
- The largest sources of non-Federal funds for FSNE were the implementing agencies themselves, State land-grant universities or Cooperative Extension Services, and local public schools.
- The largest components of implementing agency outlays were for staff salaries and benefits (64 percent), indirect costs (13 percent), and contracts, grants and agreements (10 percent).
- Although implementing agencies were allowed to claim Federal reimbursement for 50 percent of approved outlays, they reported spending more non-Federal funds than Federal funds. Constraints in financial processes at the State and implementing agencies affected the balance of Federal and non-Federal outlays. A key constraint was the implementing agencies’ uncertainty about the actual amount of non-Federal funds that would be contributed by partners.
- Three-quarters of implementing agencies spent at least 75 percent of their budgets. When implementing agencies were unable to spend substantial portions of their budgets, the reasons included: problems with cooperation of partners, staff turnover, and delayed start-up.
- The study was constrained by the limited extent of standardized data on FSNE outlays. Extensive documentation of FSNE outlays existed at all levels, but this documentation often did not use the standard categories for sources of funds and types of outlays in the FSNE Plan Guidance. Data on outlays by type of service or target audience were not available.

The following topics are presented in this section:

- Background on FSNE funding rules and processes,
- Sources and limitations of the FSNE budget and expenditure data,
- FSNE budgets for FY 2004,
- National and Statewide FSNE FY 2004 outlays,
- Per-capita measures of FSNE outlays,
- State agency FSNE outlays for internal expenses in FY 2004,
- Implementing agency FSNE outlays for FY 2004,
- Sources of non-Federal funds,
- Uses of funds,
- Nonreimbursed implementing agency outlays, and
- Unspent funds for FSNE at the implementing agency and State levels.

FSNE Funding Rules and Processes

As discussed in Chapter III, States and implementing agencies must obtain approval from FNS for FSNE plans in order to claim Federal reimbursement for FSNE outlays. FNS provides Federal funds for 50 percent of outlays for approved activities, subject to availability of funds. (For expenditures on Indian reservations, FNS reimburses 75 percent of allowable costs.) The FSNE plans include budgets for the sources of non-Federal funds and for the use of funds. Thus, the approved FSNE plan defines the activities for which Federal reimbursement may be claimed and specifies the maximum amount of Federal reimbursement for each implementing agency. States may submit amended FSNE plans to request additional funds.

States submit quarterly reports to document the Federal share of reimbursable FSP administrative expenses, including FSNE outlays. States prepare these reports using documentation submitted by implementing agencies, including outlays of non-Federal funds and outlays for which Federal reimbursement is requested. Documentation of non-Federal outlays identifies the organization providing the funds and whether the contribution was in cash or in-kind. All organizations reporting FSNE outlays must maintain records to substantiate their outlays, including time records for personnel. Cash contributions from private sources are reimbursable if FNS has approved a waiver for their use. In-kind contributions from private sources can be used by implementing agencies but are not reimbursable. Nonreimbursable outlays are not considered FSNE outlays under FNS rules.

Sources and Limitations of the FSNE Expenditure Data

Before examining the findings regarding FSNE budgets and expenditures, readers should be aware of the sources and limitations of the financial data obtained for this study. The data sources included FNS

records of approved FY 2004 FSNE budgets for all States, an FNS database of FY 2004 Federal and non-Federal FSNE outlays for all States,²⁴ and the surveys and interviews described in Chapter II.

Although the implementing agency survey referenced budget and expenditure data that all implementing agencies are expected to maintain, and although the categories were taken from budget instructions in the FY 2004 FSNE Plan Guidance, there were frequent gaps and inconsistencies in the data provided by the implementing agencies. States and implementing agencies establish their own categories for tracking and reporting detailed expenditures, as they are not required to report them in the same format as the FSNE budget. Where possible, study staff attempted to follow up and resolve these problems, either during site visits or through telephone and e-mail contacts. Study staff conducted a detailed review of the implementing agency survey data, State agency survey data, and FNS administrative data on State-level FSNE budgets and outlays to resolve discrepancies and impute missing data. This review focused primarily on obtaining the best possible estimates of total outlays for each implementing agency. These efforts resulted in the availability of total budget and outlay data for 72 of the 84 implementing agencies that responded to the survey. These 72 implementing agencies are referenced as the “financial analysis sample.” There were, however, only 42 implementing agencies with usable data on the composition of FSNE outlays by type of expense (personnel, grants and contracts, supplies, etc.), and 39 with usable data on the composition of outlays by source of funds. The analysis in this chapter also uses the FNS administrative data on State-level FSNE budgets and outlays to provide a description of FSNE finances in the 49 States that had FSNE outlays in FY 2004, plus the District of Columbia.

The study plans included collection of additional details of the implementing agencies’ expenses, including the following:

- Implementing agency staff hours and costs by level of staff (professional, paraprofessional, other), separately for the implementing agency central office and local projects/subcontractors; and
- Expense detail (compensation and benefits, materials, travel, etc.) for sampled local projects or subcontractors.

The additional implementing agency data were collected from 16 of the 33 implementing agencies that were visited. This subset of the site visit sample was not sufficiently representative to serve as a basis for analysis. It was not feasible to collect these data in all of the implementing agency site visits due to time constraints and limitations of implementing agency records. This part of the interview protocol had been included on an exploratory basis, and the study confirmed that substantial changes to record keeping would be required to support routine reporting of this information.

The same factors of burden and record structure affected the effort to collect expenses from local projects in the interview sample. In addition, expenses were often not tracked at the local project level in a way that would permit compiling a complete report of the project’s expenses. Often local projects could only identify expenses for line items that they controlled (such as travel and purchases of food), and the types

²⁴ These data include all States, except Delaware and the District of Columbia. Delaware and the Virgin Islands did not report any FSNE outlays for FY 2004. Guam reported outlays but was excluded from the analysis due to the small size of the program and the lack of implementing agency data. States may have revised their reported outlays since the data were provided by FNS in November 2005.

of expenses under local control varied. For these reasons, we did not attempt to analyze the composition of local project expenses.

FSNE Budgets for FY 2004

Budgets provide a measure of the planned scale of FSNE and the commitment of resources. Based on FNS data for all approved FSNE plans and implementing agency data collected for the study, State budgets for FY 2004 totaled \$228 million in Federal funds and \$242 million in non-Federal funds. Thus, the grand total budgeted from the implementing agencies' perspective was \$470 million. From FNS' perspective, the \$228 million in approved Federal funds represented 50 percent of the approved budgets, so the grand total of approved budgets was \$456 million. (Exhibits A7-1 and A7-2 present summary data on the budgets of the implementing agencies in the financial analysis sample.)

In the implementing agency sample, the average budget for non-Federal funds exceeded the average budget for Federal funds by 6 percent. Although States can claim Federal reimbursements (and pass them on to the implementing agencies) for 50 percent of total allowable FSNE expenses, interview data suggest one explanation for why implementing agencies reported that the non-Federal share of approved budgets exceeded the Federal share. When implementing agencies prepare their budgets, they often have uncertainty about the amount of non-Federal funds that will be available from other agencies that agree to provide these funds for FSNE. For this reason, implementing agencies often obtain commitments from providers of non-Federal funds that exceed the requested amount of Federal funds, in case some agencies do not provide the full amount committed during FSNE planning. It is also possible that the budgets reported by some implementing agencies were not final, even though the survey was conducted after the end of FY 2004 and requested approved budget data.

National and Statewide FSNE FY 2004 Outlays

Before examining FSNE outlays in detail at the implementing agency level, we begin with the national and State perspectives.

National FSNE Outlays

Nationwide outlays for FSNE totaled \$295 million in FY 2004, as shown in Exhibit 7-1. These data include the Federal total of \$147 million and the non-Federal total of \$148 million for all States, not just those represented by the financial analysis sample.²⁵

²⁵ The FSNE outlay total for the 72 implementing agencies in the analysis sample was \$260 million, 88 percent of the national total.

Exhibit 7-1. National and Statewide FY 2004 FSNE Outlays

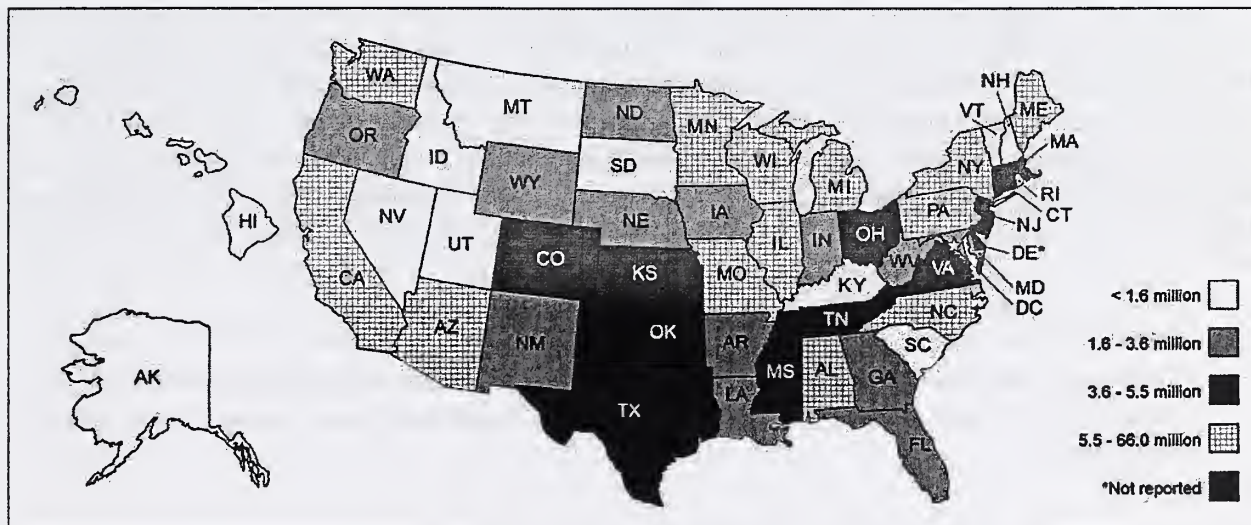
	<u>Outlays in Dollars</u> <u>(rounded to nearest \$1,000)</u>
National Total Outlays	\$294,533,000
Federal	146,688,000
Non-Federal	147,845,000
Statewide Total Outlays	
Mean	\$5,891,000
Minimum	20,000
25th percentile	1,558,000
Median	3,537,000
75th percentile	5,479,000
Maximum	65,084,000

Source: FNS National Data Bank, claims submitted by States on FNS-269 reports. Excludes Delaware, Guam and the Virgin Islands. Data extracted in November 2005 and subject to revision.

Statewide FSNE Outlays

Among the States, the mean total outlay was \$5.9 million and the median was \$3.5 million. Half of the States spent between \$1.6 million (the 25th percentile) and \$5.5 million (the 75th percentile). The range was from about \$20,000 in Hawaii to \$65 million in California. As shown in Exhibit 7-2, each region had a mix of States in different quartiles for total outlays, but there were notable clusters of States with similar levels of outlays. For example, the neighboring States of Nevada, Utah, Idaho and Montana fell in the lowest quartile, while the top quartile included Minnesota, Wisconsin, Illinois, Missouri, and Michigan.

Exhibit 7-2. States by Quartile of Total FY 2004 FSNE Outlays (in Dollars)



The top ten States, in terms of FSNE outlays, spent between \$9.7 million and \$65.1 million (Exhibit 7-3). These States accounted for 37 percent of all food stamp participants and 62 percent of all reported FSNE outlays. (Federal and non-Federal outlays, number of FSP participants, and outlays per participant in FY 2004 for the top 10 States are presented in Exhibit A7-3.)

**Exhibit 7-3. Top 10 States in Total FY 2004 FSNE Outlays
(Federal and Non-Federal)**

State	Total Outlays (rounded to nearest \$1,000)	Percent of National Total Outlays
California	\$65,084,000	22%
Pennsylvania	19,901,000	7
New York	15,839,000	5
Michigan	13,218,000	5
Missouri	13,013,000	4
Illinois	11,771,000	4
Wisconsin	11,470,000	4
Minnesota	11,311,000	4
Alabama	10,041,000	3
Arizona	9,700,000	3
Total for top 10 States	181,349,000	62

Source: FNS National Data Bank, claims submitted by States on FNS-269 reports. Data extracted in November 2005 and subject to revision.

Per-Capita Measures of FSNE Outlays

The study sought to measure the relationship of FSNE outlays to the size of the population of FSNE participants – i.e., FSNE outlays per capita – and to compare this relationship among States of different sizes. There are no data on actual FSNE participants that would allow computation of outlays per FSNE participant. Therefore, the study created two “second-best” measures of per-capita outlays that relate spending to the number of potential participants. Using total Federal and non-Federal FSNE outlays for 49 States and the District of Columbia,²⁶ we created two measures of per-capita outlays for FSNE in FY 2004:

- Total outlays per FSP participant, using average monthly FSP participation in FY 2004; and
- Total outlays per low-income person, using the number of persons with income below 185 of the Federal poverty level as estimated by the 2004 Current Population Survey, Annual Demographic Supplement.

The first measure reflects the amount of spending relative to the size of the primary target population for FSNE as specified by FNS regulations and guidance. The second measure reflects the spending relative to the larger low-income population (below 185 percent of the Federal poverty level) that many implementing agencies included in their target populations in FY 2004.

²⁶ Delaware had no reported FSNE outlays in FY 2004.

The outlay per FSP participant and the outlay per low-income person can be used to compare the relative level of FSNE activity across States. In theory, the per-capita outlay is a function of the proportion of the average number of contacts per eligible person, the mix of services provided, and the unit cost of each service. Thus, one would expect higher than average per-capita outlays in States that provide FSNE services to a higher proportion of eligible persons or more intensive services to FSNE participants (holding other factors equal, such as the degree of urbanization).

The per-capita outlay measures must be viewed with care for three reasons. First, they do not indicate how much FSNE funding was spent on the average member of the actual target population, because the degree of targeting varied on both geographic and demographic dimensions. Second, differences in the cost of living, population density, and efficiency presumably affect the cost of delivering FSNE, so two States could have different costs for these reasons and actually operate similar programs. Last, this study did not examine the impacts of FSNE and provides no guide as to the optimal level of outlays per FSP participant.

For the United States as a whole, the FY 2004 total of reported outlays was \$12.39 per FSP participant, or \$3.62 per low-income person. These are equivalent to averages weighted by total participants or low-income persons. The unweighted mean FSNE outlay per FSP participant among the States was \$16.15, and the unweighted mean outlay per low-income person was \$4.51. The medians – the best descriptor of the “typical” State – were \$11.21 per FSP participant and \$3.13 per low-income person.

One reason for variation in the two measures of per-capita FSNE outlays was that the geographic scope of FSNE differed among the States. For both measures, the FY 2004 mean for States where FSNE was available in 90 percent of counties or more was about twice the mean for States with partial availability (in less than 90 percent of counties), as shown in Exhibit 7-4.²⁷ For the outlay per FSP participant, the means were \$21.68 in States with Statewide FSNE and \$21.16 in States with almost Statewide FSNE, whereas the mean was \$11.12 per FSP participant in States with partial FSNE availability. Thus, part of the variation in these measures among the States is due to differences in the scope of FSNE. However, there was substantial variation in per-capita outlays among States with similar scope of FSNE availability. For example, among States where FSNE was available Statewide, the outlay per FSP participant ranged from \$0.21 to \$106.30. Neither the size of the low-income population nor the FSP participation rate (as a percentage of low-income households) appeared to be strongly related to the outlay per FSP participant. For interpreting the per-capita measures, an important unknown was the scope of FSNE services within the counties served by FSNE, i.e., the proportion of the target audience with access to FSNE.

²⁷ The average State had 82 percent of its counties served by FSNE. The median was 91 percent, and only 25 percent of States had less than two-thirds of their counties served by FSNE.

Exhibit 7-4. Total FSNE Outlays per FSP Participant and per Low-Income Person (Below 185% of Poverty Level) by Extent of FSNE Availability (in Dollars)

Extent of FSNE Availability	Mean Outlay per FSP Participant (Std)	Mean Outlay per Low-income Person (Std)
Statewide (all counties, n=21)	\$21.68 (25.04)	\$6.08 (5.86)
Almost Statewide (between 90 and 100 percent of counties, n=4)	21.16 (16.82)	5.86 (4.20)
Partial (less than 90 percent of counties, n=26)	11.12 (8.32)	3.09 (2.12)
All States (n=50)	16.15 (18.00)	4.51 (4.35)
United States (weighted average)	12.39	3.62

Source: Food and Nutrition Service Administrative Data (outlays and FSP participant counts); 2004 Current Population Survey Annual Demographic Survey (estimated number of persons with income below 185 percent of Federal poverty level). Study universe included 50 States and District of Columbia. One State (Delaware) had no FSNE outlays in FY 2004. Std=standard deviation. Data extracted in November 2005 and subject to revision.

The ranges of these measures were quite large. The FSNE outlay per FSP participant ranged from \$0.21 to \$106.29 (Exhibit 7-5). Similarly, the FSNE outlay per low-income person ranged from \$0.07 to \$21.81 per person. Thus, there was a great deal of variation in the quantity of funds spent relative to the population of potential FSNE participants.

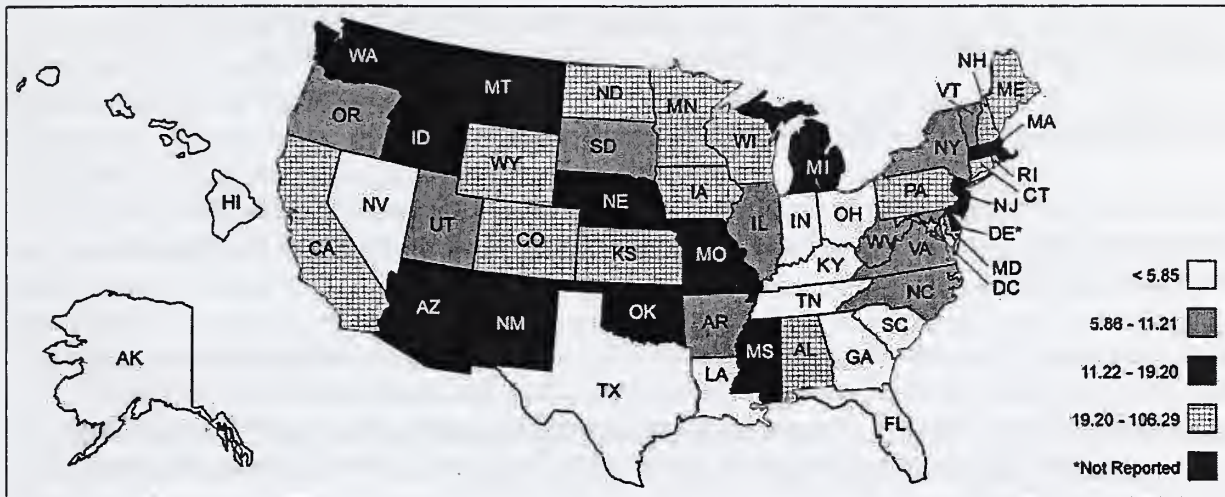
Exhibit 7-5. Distribution of Total FSNE Outlays per FSP Participant and per Low-Income Person (in Dollars)

Funds	Percentiles of States				
	Minimum	25%	50% (Median)	75%	Maximum
State Outlay per FSP Participant	\$0.21	\$5.83	\$11.21	\$19.40	\$106.30
State Outlay per Low-income Person	0.07	1.87	3.13	5.21	21.81
Number of Respondents: 50					

Source: Food and Nutrition Service Administrative Data (outlays and FSP participant counts); 2004 Current Population Survey Annual Demographic Survey (estimated number of persons with income below 185 percent of Federal poverty level). Study universe included 50 States and District of Columbia. One State (Delaware) had no FSNE outlays in FY 2004. Data extracted in November 2005 and subject to revision.

Most regions of the U.S. had substantial variation among States in FSNE outlays per FSP participant. This variation is illustrated by Exhibit 7-6, which categorizes States in quartiles on this measure. For example, the West included one State in the top quartile (California), three in the second-highest quartile (Washington, Idaho, and Arizona), one in the second-lowest quartile (Oregon), and three in the lowest quartile (Nevada, Alaska, and Hawaii). Similar variation was apparent in the Southeast, Southwest, and Midwest regions, while there was more similarity in the Northeast and Mid-Atlantic regions.

Exhibit 7-6. States by Quartile of FY 2004 FSNE Outlays (\$) per FSP Participant



Source: Food and Nutrition Service Administrative Data (outlays and FSP participant counts). Study universe included 50 States and District of Columbia. One State (Delaware) had no FSNE outlays in FY 2004. Data extracted in November 2005 and subject to revision.

Clearly, there was much variation in the level of FSNE spending among the States, even after controlling for the size of the eligible population. Given the magnitude of the variation in per-capita outlays, it is clear that States vary considerably in the intensity of FSNE activity, even taking into consideration the other factors that may affect these measures. One can reasonably infer, therefore, that there is also substantial variation in the potential for impact on the population of FSP participants and eligibles as a whole.

State Agency Outlays for FSNE

State agencies do not deliver FSNE, but they expend staff time and other resources on program administration. In the State agency survey, only four agencies provided data on internal expenses for FSNE administration that were included in FSNE outlays as reported to FNS. Interview data confirmed that few State agencies budgeted for or reported their own staff time as a FSNE expense. Two agencies (Nevada and North Carolina) indicated that they created staff positions to administer FSNE, and they expected to claim these positions as FSNE expenses in the future. A common theme from discussion was that the effort to track FSNE expenses at the State agency was not worthwhile to separate from general FSP administrative expense. The States saw their internal FSNE expenses as small, and FNS provides the same 50 percent rate of reimbursement for general FSP administrative expenses as for FSNE expenses.

Implementing Agency Outlays and Sources of Non-Federal Funds

Because the description of FSNE in this report highlights the importance and diversity of implementing agencies, this section presents an analysis of FSNE outlays at the implementing agency level. Existing national data sources do not have outlays at this level of detail, so the implementing agency survey collected data on each agency's total outlays, the sources of funds for outlays, and the breakdown of

outlays between labor and other types of expenditures. The following results are based on the financial analysis sample of 72 implementing agencies with usable data on total FSNE outlays in FY 2004, representing 77 percent of the 93 implementing agencies asked to complete the survey.

Patterns of Implementing Agency FSNE FY 2004 Outlays

The average implementing agency in the financial analysis sample reported total FSNE outlays of \$3.61 million for FY 2004. This average included \$1.84 million in non-Federal funds and \$1.77 million in Federal funds (Exhibit A7-4).²⁸

As with States, there was a wide range of reported FSNE outlays among implementing agencies. The median total expenditure was \$1.7 million (Exhibit A7-5). Thus, the average was influenced by the agencies with very large outlays. One-quarter of implementing agencies had total outlays of less than \$300,000, while another quarter had total expenditures of \$4.0 million or more. Total outlays ranged from \$8,524 to \$55.3 million.

Sources of Non-Federal Funds

An important topic for the study was to describe the sources of non-Federal funds.²⁹ On average, implementing agencies reported that approximately one-third (33 percent) of non-Federal funds came from the implementing agency itself and another one-third (33 percent) came from a State land-grant university (Exhibit 7-7). Other notable sources of non-Federal funds were: local public education agencies (10 percent), miscellaneous other public agencies (13 percent), and private nonprofit organizations (4 percent). State agencies provided only 3 percent of non-Federal funds for FSNE, and no implementing agencies reported spending funds from private for-profit organizations.

Exhibit 7-7. Mean Percent of Non-Federal Funds Expended, by Source: University-Based Implementing Agencies and Others

Source of Funds	All Implementing Agencies	University-Based Implementing Agencies	Other Implementing Agencies
Implementing agency	33%	74%	32%
State land grant universities	33	[incl. above]	11
Other public agencies	13	16	3
Local public education agencies	10	9	14
Private nonprofit organizations	4	2	11
Indian Tribal Organizations	3	0	17
State food stamp agencies	4	0	11
Number of Respondents	39	30	9

Source: Implementing Agency Survey. Items may not sum to 100 percent because of rounding.

²⁸ See Appendix B: Methodological Appendix for description of methods and assumptions used to impute or revise the total FSNE outlays for implementing agencies in the sample.

²⁹ Among the financial analysis sample, 39 implementing agencies provided complete and valid data on the sources of funds expended on FSNE in FY 2004. The analysis in this section is thus based on a smaller and possibly biased sample.

Exhibit 7-7 presents the average percentages of non-Federal funding by source for two categories of implementing agencies: those that were based in a State university or Cooperative Extension Service of a State university, and all others.³⁰ (Among the 39 agencies in this analysis, 30 were university-based, and 9 were not.)³¹ For university-based implementing agencies, 74 percent of non-Federal outlays were from implementing agency funds or other State university funds. The other major sources of non-Federal funding for university-based implementing agencies were local public education agencies (9 percent of non-Federal outlays) and other public agencies (16 percent).

Interview data confirm that implementing agencies were a major source of non-Federal funds but usually not the primary source. Overall, three-quarters (75 percent) of the implementing agencies in the interview sample indicated that they provided some of the non-Federal funds for FSNE, with 29 percent providing all or most of these funds.³²

The interview data suggest that there were three basic approaches to the implementing agency's role in providing non-Federal funds: full implementing agency funding, partial implementing agency funding, and no implementing agency funding (Exhibit 7-8). A minority of implementing agencies interviewed (18 percent) provided all of the non-Federal funds. The majority of implementing agencies (between 57 percent and 61 percent) provided some but not all of the non-Federal funds. In this group, the implementing agency usually provided funds to cover the non-Federal share of its central staff and their expenses, and some implementing agencies also provided non-Federal funds to support local projects. Between 21 and 25 percent of implementing agencies interviewed relied solely on funds from outside the implementing agency. Under this approach, non-Federal funds from partners supported not only the delivery of FSNE by local projects or subcontractors, but also the central administrative and support functions of the implementing agency. Some implementing agencies indicated that this transfer of funds was well accepted by the local project staff and partners, while others found this to be a source of tension.

³⁰ The university-based implementing agencies included: Cooperative Extension Services; nutrition/public health schools, departments, or colleges of a university; and other departments or colleges of universities. All of these agencies were based in State universities. Among all survey respondents, there were 56 university-based implementing agencies, representing 67 percent of the sample.

³¹ Among the university-based implementing agencies, there appeared to be some inconsistency in how reported outlays were divided between the "implementing agency" and "State land grant university" categories, and it is likely that most or all of the reported State land grant university funds were actually implementing agency funds. Therefore, these categories are combined in the exhibit. We did not attempt to compare the sources of non-Federal funds between other groups of implementing agencies, such as those with or without nutrition networks, because of the data limitations: the small number of responses with usable data and the ambiguity of sources for university-based implementing agencies.

³² In the interview data analysis, if the implementing agency was part of the university, funds coming from the school that served as the implementing agency were treated as implementing agency funds, and funds coming from other parts of the university (including general administration or indirect) were treated as "university/CES-other." For 4 percent of the interview sample, it was apparent that the university-based implementing agency provided some funds, but it was uncertain whether other university/CES funds were used. In the survey, it appears that some university-based implementing agencies, particularly Cooperative Extension Services, treated any funds outside their immediate department as nonimplementing agency university funds.

Exhibit 7-8. Implementing Agency Sources of Non-Federal Funds: Interview Data

Role in Non-Federal Funding	Implementing Agency	University/CES (not IA)	Other State	Local schools	Other local pub. agencies	Indian Tribal Org.	Private nonprofit	Other
All	18%	0%	0%	0%	7%	0%	0%	0%
Most	11	0	0	7	4	0	0	0
Other	46	11	7	43	39	14	29	4
Total (Any funds from source)	75	11	7	50	50	14	29	4
No funds from source	21	46	86	39	43	86	64	96
Not sure	4	43	7	11	7	0	7	0
Number of Respondents: 28								

Notes:

"University/CES (not IA)" refers to funds from sources other than the implementing agency itself.

"Other State" refers to funds from State agencies that are not the implementing agency, a State university, or a Cooperative Extension Service.

"Other local pub. agencies" refers local public agencies other than the implementing agency.

Source: *Implementing Agency Interviews*.

The interviews confirmed the significant role of local public school districts as a source of funds. At least half of the interview sample received some funds from local schools, typically in the form of teachers' salaries for time spent providing or assisting FSNE. In four of the 28 implementing agencies that addressed this topic (14 percent), local schools were the sole source of non-Federal funds, other than the implementing agency and its parent organization. More commonly, implementing agencies used a mix of funds from local schools and other local government health or human service agencies (other local public agencies provided funding to 50 percent or more of the implementing agencies). Nonprofit agencies were identified as a funding source by 29 percent of the implementing agencies, although in some cases the nonprofit agencies may have used State or local government funds.³³ The implementing agencies that identified Indian Tribal Organizations (ITOs) as a source of funds were non-Indian implementing agencies that partnered with ITOs.

Interview respondents described several factors affecting the amount of non-Federal contributions that were actually received from partners, including: partners' interest, ability to prove that they served the target low-income or food stamp eligible population, availability of allowable funds, willingness to complete paperwork, budget cuts or changes in priorities at partner agencies, delays in FSNE startup leading to partners being unable to fit FSNE into their schedules (most often involving schools), and availability of space to provide FSNE.

³³ When local or private nonprofit agencies provided funds, the implementing agency reported the type of agency providing the funds, not the original source. For example, local child care programs were identified as nonprofit organizations, but some of the funds that they provided may have come from State appropriations.

In-Kind and Cash Outlays of Non-Federal Funds

The FSNE Plan Guidance identifies two types of allowable sources of non-Federal funds: cash and in-kind. The definition of in-kind contributions is “volunteer time or other nonbillable goods or services (e.g., there is no cash transfer between parties).” An in-kind contribution is an allowable cost if: the donation is made by to a public agency, it is not claimed as match in non-Federal funds for another Federal program, it is allowable, reasonable and necessary for the delivery of FSNE, and it is valued according to the applicable OMB Circulars. Non-Federal funds spent on salaries for FSNE personnel, supplies, or other payments are cash contributions, whether the funds are spent by the implementing agency or by a partner.

The surveys and interviews indicated some differences in understanding regarding the distinction between in-kind contributions and cash outlays. In the interviews, some implementing agencies used “in-kind” broadly to include some or all of the non-Federal outlays for salaries and purchased goods and services. Some implementing agencies characterized both their own expenditures of non-Federal funds and those of partners as “in-kind,” while others used “in-kind” only in referring to the expenditures of partners that were not reimbursed by the implementing agency. Due to the uncertainty about the distinction between in-kind donations and cash outlays, this study did not attempt to analyze the proportions of expenditures in these categories.

Uses of Funds by Type of Expenditure

In FY 2004, the largest component (64 percent) of implementing agency outlays was for staff salaries and benefits.³⁴ The second-largest type of expense was for indirect costs (13 percent), followed by contracts, grants and agreements (10 percent). No other category represented more than 3 percent of implementing agency expenses (Exhibit 7-9).

Exhibit 7-9. Composition of FSNE Outlays by Type of Expenditure

Type of Expenditure	Mean Percent
Salaries and benefits	63.5%
Indirect costs	12.9
Contracts, grants, agreements	9.9
Other services (not listed elsewhere)	2.8
Nutrition education materials	2.6
Noncapital equipment & supplies	2.4
Travel	2.0
Building/space	1.9
Administrative	1.4
Maintenance	0.2
Equipment/other capital expenditures	0.5
Number of Respondents: 41	

Source: Implementing Agency Survey. Std=standard deviation.

³⁴ This analysis used data for the breakdown of outlays by type of expense from 41 implementing agencies. The other 31 implementing agencies in the full analysis sample did not provide usable data on this breakdown.

Nonreimbursed Implementing Agency Outlays

Under FNS rules, FSNE outlays are reimbursable only if FNS has approved the activities, the outlays are within the approved budget levels, and non-Federal funds are not claimed as outlays for any other Federal program. For cash contributions from private sources, the State must obtain a waiver by affirming that the contributor has not restricted the use of the funds and does not receive a benefit in return for the contribution. To obtain reimbursement for approved activities, an implementing agency must submit adequate documentation to the State agency. If a partner contributes funds by paying the salaries and benefits of personnel who help deliver FSNE, the partner must document the time spent by these personnel and their pay rates.

According to the implementing agencies, Federal reimbursement often represented less than half of their allowable outlays related to FSNE. In the survey, just over half of implementing agencies (51 percent) reported allowable non-Federal outlays exceeding their Federal outlays. If these agencies with “excess” non-Federal outlays had claimed Federal funds for the full 50 percent of their outlays (as reported in the survey), the total Federal outlays for the analysis sample would have increased by \$7.6 million.³⁵

To understand these findings, it is important to take into account the implementing agencies’ approach to obtaining non-Federal funds for FSNE when their own funds were insufficient to accomplish their plans. Implementing agencies rarely reported receiving outright grants of cash from partners. Instead, implementing agencies usually planned for partners to provide funds in the form of staff salaries and other expenses in support of FSNE. The Federal reimbursement that the implementing agency was eligible to claim for these expenses was used for expenses that did not have non-Federal sources of funds. For example, if an implementing agency received a non-Federal contribution of \$100,000 in teacher time for FSNE from public schools, the agency could spend \$100,000 of Federal funds on its own staff and expenses without providing any of its own funds. This approach is quite different from the way that most FSP administrative expenses are funded, with staff positions and other expenses supported jointly by Federal funds and by State and local revenue appropriated specifically for this purpose.

In the interviews, implementing agencies often reported uncertainty about how much non-Federal funds their partners would provide. The actual amount depends on whether partners provide the planned level of staffing or other support, and on whether they provide the necessary documentation. As a result, implementing agencies often budget their spending assuming that partners will contribute less than the amounts committed in the FSNE plan. Implementing agencies may cut back on their own spending to avoid overspending their internal funds if documented contributions from partners are less than expected. When partners’ contributions of non-Federal funds exceed implementing agencies’ spending, it is not

³⁵ Of the agencies with “excess” non-Federal outlays, 16 percent had spent their entire Federal budget. In principle, these agencies could have submitted revised FSNE plans to request approval to spend additional Federal funds.

always possible for implementing agencies to “catch up” and use all of the Federal funds earned through partners’ contributions.³⁶

Several implementing agencies also indicated that they claimed less non-Federal funds than the amount of documented contributions, because they were not always certain that the contributions were allowable, and they were concerned about the financial problems that would arise if contributions were later disallowed by FNS. For example, the California nutrition network explicitly maintained a reserve of millions of dollars in unclaimed contributions, because of past experience that some contributions were determined later by FNS to be unallowable. Local officials of partner agencies sometimes promise in good faith contributions that turn out to be Federal in origin or are claimed as a non-Federal contribution to another program. In other instances, implementing agencies have claimed expenses that FNS determines are not necessary and reasonable, such as charging professional salary rates for paraprofessional services (e.g., doctors delivering basic nutrition education). In such instances, the implementing agency must offset the loss of Federal funds with non-Federal funds, which therefore cannot be used for other purposes.

In their cost reports to FNS, States generally exclude any non-Federal outlays that exceed the Federal outlays. For FY 2004, only six States (12 percent) reported more non-Federal outlays than Federal outlays. Thus, some non-Federal outlays are excluded when implementing agencies report to States, and additional non-Federal outlays are excluded when States report to FNS.³⁷

The preceding pattern of handling non-Federal funds has three implications for FSNE. First, the amount of non-Federal outlays reported to FNS in some States understates the full value of the contributions of non-Federal funds by implementing agencies and partners for approved activities – i.e., the real cost of FSNE, at least in the economic meaning of the term. It is true, however, that some non-Federal contributions are not actually allowable, so the gap between “real” and reported costs may not be as great as the survey data imply. Second, greater certainty about the amount of allowable non-Federal contributions would enable implementing agencies to utilize more of the budgeted Federal funds to provide FSNE. Third, the processes of budgeting and managing funds for FSNE constrain the extent to which implementing agencies draw down available Federal funds. One such constraint is the implementing agencies’ approach to funding FSNE; another is the time and burden of revising the FSNE plan to increase the budget.

Over two-thirds of implementing agencies (70 percent) reported that all of their FY 2004 FSNE outlays qualified for reimbursement. Only 11 percent of implementing agencies surveyed reported that they had nonreimbursable FSNE-related outlays in FY 2004, and 19 percent did not respond “yes” or “no” to this question. As noted above, nonreimbursable outlays are not part of FSNE, even if State or local agencies

³⁶ An implementing agency may not have sufficient time before the end of the fiscal year to determine that additional funds are available and spend those funds (by reallocating staff or making purchase). Legal or institutional rules may prevent the implementing agency from claiming Federal reimbursement and passing it on to a partner that has contributed non-Federal funds. If an implementing agency wishes to claim more than the full amount of approved Federal funds, it must request an amendment to the FSNE plan, and time or other factors may preclude this option.

³⁷ In some States, the difference in non-Federal outlays between implementing agency and State data may be due to a determination by the State that some outlays are not allowable. We did not attempt to reconcile these data or determine the reasons for differences.

might think of them this way. Of the implementing agencies that reported having nonreimbursable outlays, all but one indicated that the nonreimbursable outlays were not included in their final report of expenses or invoice to the State agency.

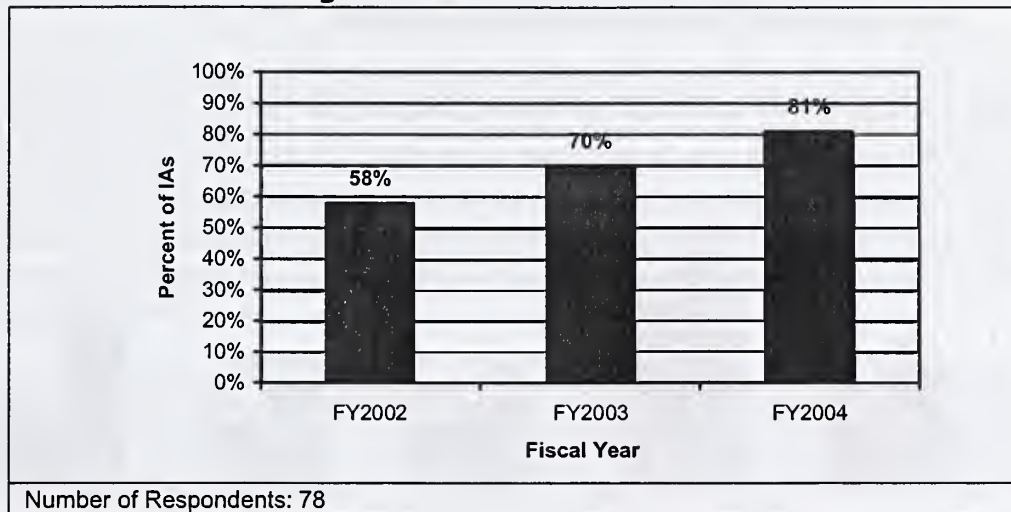
In the implementing agency interviews, two reasons were cited for having nonreimbursable outlays: use of nonreimbursable sources of funds, and use of public funds for activities not approved for Federal funding by FNS. The Cooperative Extension Service in New Jersey received a grant from the Dairy Council, but the agency did not obtain a waiver to claim this as reimbursable non-Federal funds. North Carolina State University, which sponsored three implementing agencies in FY 2003, advanced funds to one of the implementing agencies for an activity that it conducted in FY 2003 and proposed again for FY 2004, based on the assumption that it would be approved as it had in the past. However, the University learned that the activity would not be approved and therefore was not included as part of the North Carolina's FSNE plan. Instead, North Carolina State University incurred costs for an unapproved activity and, therefore, could not receive Federal reimbursement for those costs.

Unspent Funds for FSNE at the Implementing Agency Level

Another important question for the study was whether implementing agencies spend all of their budgets for FSNE, and if not, why. About four-fifths (81 percent) of implementing agencies reported that they spent less than the budgeted amount on FSNE in FY 2004 (Exhibit 7-10). The comparable figures were 70 percent in FY 2003 and 58 percent in FY 2002. Thus, there appears to be a trend of more implementing agencies underspending.

The analysis of implementing agency budgets and outlays provides a perspective on the magnitude of underspending. In the financial analysis sample, half of implementing agencies spent 90 percent or more of their budgets, and three-quarters spent more than 75 percent of their budgets. Thus, while most implementing agencies did not spend their entire budgets, the percentage remaining tended to be relatively small. The average total outlay was 84 percent of the total budget (Exhibit A7-7). Implementing agencies spent, on average, 85 percent of budgeted non-Federal funds and 82 percent of budgeted Federal funds. These averages were influenced by implementing agencies with very low spending percentages.

**Exhibit 7-10. Implementing Agencies Spending Less than Budgeted Amount:
FY 2002 through FY 2004**



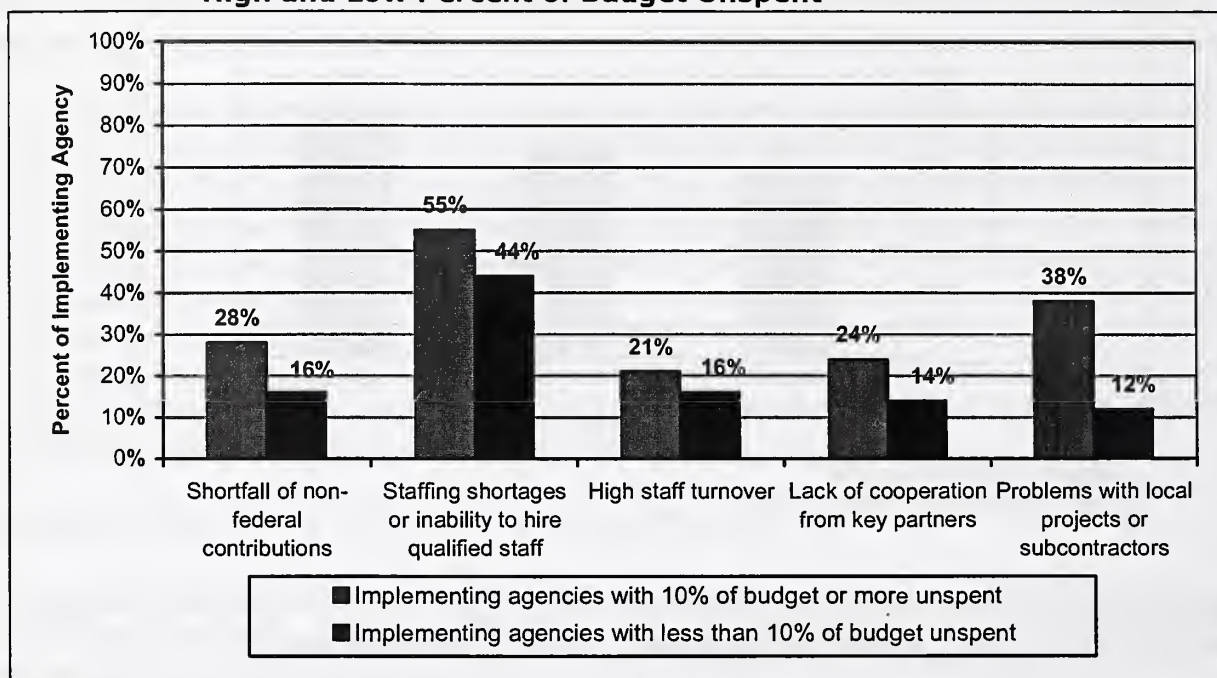
Source: Implementing Agency Survey

Implementing agencies that spent smaller percentages of their budgets more often reported several types of problems that were likely to result in unspent funds. To examine this relationship, implementing agencies were divided into two groups: those with 0 to 10 percent of their budget unspent, and those with more than 10 percent unspent. As shown in Exhibit 7-11, the implementing agencies with more unspent funds were more likely to report each of the following reasons for not implementing FSNE as planned in FY 2004:

- Shortfall of non-Federal contributions (28 percent vs. 16 percent),
- Staffing shortages or inability to hire qualified staff (55 percent vs. 44 percent),
- High staff turnover (21 percent vs. 16 percent),
- Lack of cooperation from key partners (24 percent vs. 14 percent), and
- Problems with local projects or subcontractors (38 percent vs. 12 percent).

Shortfalls of non-Federal contributions were an important challenge to spending available Federal funds and implementing FSNE as planned. Among the local project respondents that provided information on the challenges of obtaining non-Federal funds, 50 percent (14 of 28) indicated that it was more difficult to obtain these funds in FY 2004 than in the two previous years. These respondents indicated that challenges such as those listed above had grown, such as more emphasis on “high-stakes” testing in the schools and more budget cuts affecting partners.

Exhibit 7-11. Problems Resulting in Unspent Funds: Implementing Agencies with High and Low Percent of Budget Unspent



Source: Implementing Agency Survey

To the extent that funding from partners was less than anticipated, the implementing agencies had to either cut back programs, find other non-Federal funding, or use their own funds, since Federal funds could not be used to fill these gaps. The interviews confirmed that the ability of implementing agencies to spend their own funds was in some cases constrained by problems with the FSNE plan leading to delayed approval and start-up, partners not being able to participate in FSNE as planned, and staff turnover. In addition, a few implementing agencies indicated that they intentionally underspent their budgets, as a way to make sure they did not overspend.

Unspent Funds for FSNE at the State Level

Most States spent more than 80 percent of their Federal FY 2004 budgets for FSNE, while one-quarter of States spent 66 percent or less. (States' non-Federal budgets were not available, so the analysis focused on spending of Federal funds.) The median was 82 percent spent and the average was 76 percent. The unspent Federal funds in California, estimated to be about \$54 million, represented two-thirds of the national total of \$81 million in unspent Federal funds in FY 2004. Excluding California, the percentage of the Federal budget spent tended to increase with the size of the Federal budget for the State (correlation=.24).

CHAPTER VIII. COMPARISON OF FY 2004 FSNE STUDY FINDINGS TO THE 2005 GUIDING PRINCIPLES

On September 15, 2005, FNS released the “FSNE Guiding Principles,” a policy document containing six overarching principles designed to provide the big picture and future direction for food stamp nutrition education. The document identifies standards of excellence towards which FSNE efforts should strive and delineates the roles and responsibilities of key stakeholders, including FNS, State food stamp agencies, implementing agencies, local offices/subcontractors and local food stamp offices. The Guiding Principles were first incorporated in the annual FSNE Plan Guidance issued by FNS for FY 2007 for operational implementation.

Although FSNE stakeholders did not operate under the Guiding Principles in FY 2004, a comparison of the study findings to the standards of excellence outlined in the Guiding Principles is useful. The comparison offers a baseline measure of how close FSNE operations in FY 2004 were to reaching the ideals of the Guiding Principles, recognizing that some programmatic changes may have occurred in the interim. The study data also identify some successful practices and potential barriers facing FSNE providers as they strive to meet these ideals in future years.

Guiding Principle 1: Food Stamp Nutrition Education is intended for Food Stamp Program recipients and individuals eligible for the Food Stamp Program.

Overall, the study findings indicate that FSNE providers make strong efforts to find and serve food stamp recipients and applicants. Nearly three-quarters of State food stamp agencies indicated that they asked implementing agencies to make food stamp recipients and applicants a high priority, but they allowed implementing agencies to target broader populations. In addition, data regarding participation in FSNE by food stamp recipients paint a generally positive picture. Implementing agencies estimate that just over half of FSNE participants are food stamp recipients, with an additional 23 percent being income eligible but not participating. Thus, FSNE is primarily provided to the intended audience, even though implementing agencies generally target a broader income range of individuals, with 40 percent of implementing agencies targeting at or below 185 percent of the Federal poverty level.

While one could assume that the logical location for reaching food stamp recipients would be local food stamp offices, findings show that the success of providing FSNE at food stamp offices is mixed, with 46 percent of implementing agencies reporting having delivered FSNE at local food stamp offices in FY 2004. The primary uses of local food stamp offices were for one-time classes and distribution of educational materials. In addition, during site visits, State food stamp officials expressed concerns that trends towards web-based systems and call centers for customer service make it unlikely that local food stamp offices will be utilized as much for FSNE delivery in the future. As a result, implementing agencies will need to focus on recruiting food stamp recipients at locations and agencies where services are being provided to more general low-income audiences.

Another of the challenges noted by FSNE providers, both at the State and local level, was the fact that FSNE providers have not been effective in identifying which FSNE participants are actually food stamp recipients. Where services are provided in sites such as a TANF work incentive program, a food bank, or in low-income housing centers, data on the Food Stamp Program eligibility of the population are readily available. This task is not as easy, however, when services are provided in schools, at community events,

or in general gathering places such as health fairs or grocery stores. For schools, implementing agencies require 50 percent of enrolled children be eligible for free or reduced-price lunch. For other sites, there is no such standard.

Much concern was expressed by State and implementing agency officials about how this Guiding Principle would be implemented. Most of the implementing agencies targeted clients at a higher income level and requested waivers, but actually served a lower income audience (where such information was reported). Many State officials and implementing agency staff that were interviewed believed that if a screening tool to determine FSP eligibility becomes a requirement, the scope and nature of FSNE will significantly change to serving fewer clients in fewer locations.

Guiding Principle 2: FSNE is a set of learning experiences designed to facilitate the voluntary adoption of eating and other nutrition behaviors conducive to the health and well-being of individuals on a limited budget.

This Guiding Principle focuses on certain behavioral outcomes to encourage individuals to:

- Eat fruits and vegetables, whole grains, and low-fat milk products every day;
- Be physically active every day; and
- Balance calorie intake from foods and beverages with calories expended.

Virtually all of the implementing agencies focused on the three behavioral outcomes set forth in the Guiding Principles. Additionally, most of the implementing agencies delivered FSNE through the use of multiple components of the *Dietary Guidelines for Americans*, and they focused on both providing information and trying to promote behavioral changes, as reported in the survey. Of implementing agencies that conducted outcome evaluations, a majority reported using in-person client interviews or surveys to collect data (typically self-report, pre-post data, including dietary recalls), and 50 percent found positive behavior change.

As was noted in Chapter V, interview data suggest that nutrition education was provided within the context of a client's limited budget. Making healthy food choices on a limited budget was cited by most implementing agency and local officials as the top educational goal for FSNE.

Guiding Principle 3: FSNE has the greatest potential impact on the nutrition-related behaviors of the overall food stamp populations when it targets women and children in food stamp eligible households.

Findings indicate that most FSNE activities are directed at women and children. Implementing agencies indicated that 42 percent of FSNE participants were children and 25 percent were adult women. (Nonelderly adults were 36 percent of participants, and 70 percent of adults were women). In addition, 81 percent of implementing agencies provided direct education to children in public schools, and 75 percent provided direct education in youth education sites such as YMCAs and preschools.

It is important to note that of the implementing agencies visited that target children in schools, most hoped to be able to influence decisions made at home. While limited evaluation of this effort was

conducted, there were no methodologically strong studies or evaluation efforts found during the site visits that examined behavioral change at home.

In addition, some implementing agencies noted during the site visits that it was becoming harder to reach women because of work requirements set up for social programs. While it was relatively easy to capture women in their target audience while they attended training or education programs, once these women started working, it became more difficult to find a time that was convenient for including them in FSNE.

Guiding Principle 4: FSNE uses science-based behaviorally-focused interventions and can maximize its national impact by concentrating on a small set of key outcomes.

This Guiding Principle focuses on three major areas:

- Interventions should be tested and be science-based;
- The focus of messages should be towards motivation of behavioral change and include active personal engagement and multiple exposures to the messages; and
- States are encouraged to use a variety of approaches to message delivery.

Findings from the study indicate that there was variance among implementing agencies with regard to science-based interventions. It was found that most implementing agencies (71 percent) used tested materials, and that implementing agencies using social marketing used messages in the campaign that had been tested with target audience groups. Other implementing agencies conducting direct delivery used curricula that had either been tested in the past by their agency or by other FSNE providers. However, most implementing agencies had not tested their curricula with new target audiences. This means that the nutrition educator may have been presenting information to clients that might not have been as relevant to their nutritional needs. For example, one implementing agency noted that they had discovered a flaw in the application of their curriculum when delivered to newly arrived Eastern Europeans. The curriculum emphasized consumption of a variety of fruits and vegetables, and it was later discovered that this population already had a much greater consumption of fruits and vegetables than the FSNE audience with which the curriculum was tested.

Almost all implementing agencies focused on behavioral change, and many included additional topics and behavioral focuses beyond the three noted above. However, it is important to note that this study did not examine the quality of efforts designed to measure behavioral outcomes. During the interviews many of the implementing agencies indicated that they tried to measure behavioral change, but often were not in a good position to do ongoing evaluation of behaviors. For example, a person may complete a post-intervention questionnaire or survey indicating that they have changed behaviors, but there are very few implementing agencies that conduct follow-up to measure if these behavior changes are, in fact, real (rather than a programmed response to having received FSNE) or if they are long-term in nature.

One of the issues of concern to implementing agencies was the limitations placed on including physical activity in their FSNE activities. While promotion of physical activity was allowed as part of promoting the dietary guidelines, the methods by which it was promoted were sometimes questioned as an allowable activity. Activities directly related to engaging in physical activity, such as conducting exercise classes, were generally not allowed by FNS as an approved activity.

Implementing agency and local project directors felt that just providing information about physical activity would not motivate clients to actually engage in physical activities. Many noted that promoting the guiding principle of “Be physically active every day” and the principle of “focus of messages should include active personal engagement and multiple exposures to message delivery” would seem to call for a more engaged approach to including physical activity in FSNE. They also noted that cooking classes were seen as an appropriate method for promotion of healthy eating, and felt that including some sort of physical activity in promoting that principle would be logical.

Guiding Principle 5: FSNE can maximize its reach when coordination and collaboration take place among a variety of stakeholders at the local, State, regional, and national levels.

There were mixed results in regard to the coordination of nutrition education and collaboration among stakeholders. With regard to coordination among FNS-funded programs, almost all implementing agencies (84 percent) reported coordination of FSNE with WIC, and 81 percent reported coordination with EFNEP. In addition, most agencies that coordinated with these programs described FSNE as “moderately” or “well” coordinated. However, there was general agreement that the quality of coordination could be improved upon, and many implementing agencies looked to FNS to provide leadership and guidance in this area. As noted earlier in this report, for those USDA-funded programs where coordination did not appear as strong, such as the school meals programs and Team Nutrition, State food stamp agencies described how the reduced coordination could be due to the lack of adequate resources, namely staff, time, and money. However, when asked for suggestions on improving the coordination between FSNE and other USDA-funded programs, one State food stamp agency official noted, “it must come from the top down. FNS must bring all USDA partners together to discuss their programs, enable people to meet, thereby enhancing collaboration and avoiding reinvention of the wheel.” The promotion of State Nutrition Action Plans (SNAP) represents a move in this direction.

Coordination with non-FNS funded entities was significantly less prevalent, with only 38 percent of implementing agencies reporting efforts to coordinate nutrition education across agencies. About one-third (32 percent) used a nutrition network as a formal coordinating mechanism. Most often, coordination was prevented by either a lack of interest on the part of either or both parties, or a lack of resources to promote coordination.

Levels of coordination also vary at the local level. Many local projects relied on their partners to provide the audience for FSNE, and consider this arrangement to be local coordination. However, simply providing a site for conducting FSNE may not be true coordination. For example, there is considerable variation in the level of participation in the planning and implementation of FSNE on the part of partners. Some of the local projects visited fully involve their partners in the planning process, while other local projects had partners that were only vaguely aware of the FSNE activities. For example, when FSNE is provided in a WIC clinic, there is usually more involvement on the part of the WIC clinic staff in FSNE activities than when FSNE is presented in a TANF job training program or other non-health-related class.

One of the strong points of the current FSNE delivery system is that there are well-coordinated programs within several the States. Excellent examples identified by this study include Hawaii, where representatives from all FNS-funded programs worked together on a coordinating council to promote nutrition education in a consistent manner (see Chapter V). FNS is in a good position to promote these examples to other States through information-sharing and technology transfer. Coordination efforts

highlighted in this report can be used as a starting point, but there are likely other high-quality efforts being conducted in States that were not visited by the study team.

Guiding Principle 6: FSNE is enhanced when the specific roles and responsibilities of local, State, regional and national food stamp agencies and nutrition education providers are defined and put into practice.

This Guiding Principle clearly lays out the expected roles and responsibilities of various constituents involved in FSNE. The study found that implementing agencies, local projects and subcontractors, and program partners all play an active role in conducting FSNE, and are close to meeting the roles laid out in the Guiding Principle. With regard to State food stamp agencies, there were mixed results. Several State agencies had taken steps to expand their role from prior years in relationship to their implementing agencies, the FNS Regional Offices, and with program partners. These agencies were becoming more involved in the areas of FSNE program planning, administration, and monitoring. On the other hand, there were still some State food stamp agencies that saw FSNE as a pass-through and did not want to be involved, or did not have the resources to be involved, in major FSNE decisions. There are strong views on both sides of this issue, and FNS will have a challenge to move all State food stamp agencies to become more involved and meet the Guiding Principle roles and responsibilities.

One of the major challenges facing States with regard to implementing this Guiding Principle is the promotion of local food stamp office involvement in FSNE. The study found that local food stamp offices often had little time or interest in adding a FSNE component to food stamp certification and other administrative activities. Unlike other FNS programs (such as WIC), the FSP has not placed the primary responsibility for nutrition education in the local offices where most customer interactions take place. Since its inception, FSNE has been planned and delivered by agencies not affiliated with the State food stamp agency, and only in recent years have efforts been made to better involve State and local food stamp officials in FSNE planning and implementation. As noted previously, the trend toward using the internet and call centers for customer service is reducing the number of recipient visits to local food stamp offices, and this trend poses an additional challenge for local food stamp office involvement in FSNE.

During the site visits, most local FSNE providers reported that local food stamp offices lacked the resources, interest, or motivation to participate in FSNE. Even in some States where the State food stamp officials were highly involved in FSNE planning and implementation, there were challenges to convincing local food stamp offices to become involved in FSNE. Increasing local food stamp office involvement is likely to remain a major challenge for States and FNS to meet this portion of the Guiding Principles.

In summary, study findings indicated that striving to achieve the standards of excellence for FSNE Guiding Principles will be relatively easy in some areas, while others will require a great deal of work.

Appendix A

Additional Exhibits Chapters III through VII

CHAPTER III ADDITIONAL EXHIBITS

Exhibit A3-1. Number of Implementing Agencies per State

Number of Implementing Agencies	Number of States	Percent of States
One Implementing Agency	30	60%
Two Implementing Agencies	14	28
Three Implementing Agencies	3	6
Four Implementing Agencies	0	0
Five Implementing Agencies	1	2
Six Implementing Agencies	2	4

Number of Respondents: 50

Source: State Agency Survey

Exhibit A3-2. Number of Implementing Agencies by State

State	Number of Implementing Agencies	State	Number of Implementing Agencies
Alaska	1	Montana	1
Arizona	1	Nebraska	1
Arkansas	2	Nevada	2
California	2	New Hampshire	1
Colorado	1	New Jersey	1
Connecticut	2	New Mexico	1
Delaware	1	New York	2
District of Columbia	1	North Carolina	6
Florida	1	North Dakota	1
Georgia	2	Ohio	1
Hawaii	1	Oklahoma	3
Idaho	1	Oregon	1
Illinois	2	Pennsylvania	1
Indiana	1	Rhode Island	1
Iowa	2	South Carolina	2
Kansas	1	South Dakota	1
Kentucky	1	Tennessee	2
Louisiana	1	Texas	6
Maine	2	Utah	1
Maryland	1	Vermont	5
Massachusetts	1	Virginia	1
Michigan	1	Washington	3
Minnesota	2	West Virginia	1
Mississippi	2	Wisconsin	3
Missouri	2	Wyoming	1

Number of Respondents: 50

Source: State Agency Survey

Exhibit A3-3. State Agency Perception of Their Involvement by Type of Implementing Agency

Type of Implementing Agency	Percent Very Active SFSA Involvement
A local public health department	100%
An emergency food provider, such as a food bank or pantry	100
Other	100
A Tribal council or Tribal health program	75
A nutrition or public health school/department/college within a university	60
The CES of a land-grant university	57
A department or college, other than public health, within a university	50
A division of a State or territorial health department	50
A State Department of Aging or Elderly Services	50
Total	63

Note: One or more responses were given by each respondent.

Source: State Agency Survey

Exhibit A3-4. Implementing Agencies Who Responded to Survey by State, Region and Type

Name of Implementing Agency	State	Region*	Type as per Response of Survey
University of Alaska Fairbanks, Cooperative Extension Service	Alaska	2	The Cooperative Extension Service of a Land-Grant University
Arizona Department of Health Services	Arizona	2	A division of a State or territorial health department
Family and Consumer Sciences, Cooperative Extension Service, University of Arkansas	Arkansas	5	The Cooperative Extension Service of a Land-Grant University
University of Arkansas at Pine Bluff	Arkansas	5	The Cooperative Extension Service of a Land-Grant University
California Department of Health Services/California Nutrition Network	California	2	A division of a State or territorial health department
University of California, Davis	California	2	A department or college, other than public health, within a university
Colorado State University	Colorado	3	Other
CT Department of Public Health	Connecticut	7	A division of a State or territorial health department
University of Connecticut, Family Nutrition Program	Connecticut	7	A nutrition or public health school/department/college within a university
University of Delaware	Delaware	6	
DC Department of Health	District of Columbia	6	A division of a State or territorial health department
University of Florida	Florida	1	The Cooperative Extension Service of a Land-Grant University
University of Georgia Cooperative Extension Service	Georgia	1	The Cooperative Extension Service of a Land-Grant University
University of Georgia Older Adults	Georgia	1	A nutrition or public health school/department/college within a university
University of Hawaii, College of Tropical Agriculture and Human Resources, Cooperative Extension Service	Hawaii	2	The Cooperative Extension Service of a Land-Grant University
University of Idaho Extension Nutrition Program	Idaho	2	The Cooperative Extension Service of a Land-Grant University
University of Illinois at Chicago, Division of Community Health	Illinois	4	A department or college, other than public health, within a university
University of Illinois Extension at Urbana-Champaign	Illinois	4	The Cooperative Extension Service of a Land-Grant University
Purdue University Cooperative Extension Service	Indiana	4	The Cooperative Extension Service of a Land-Grant University
Iowa Nutrition Network; Iowa Department of Public Health	Iowa	3	A local public health department
Iowa State University Extension	Iowa	3	The Cooperative Extension Service of a Land-Grant University
Kansas State University/State Department of Social and Rehabilitation Services	Kansas	3	The Cooperative Extension Service of a Land-Grant University
University of Kentucky	Kentucky	1	The Cooperative Extension Service of a Land-Grant University
Louisiana State University	Louisiana	5	The Cooperative Extension Service of a Land-Grant University
Maine Nutrition Network, University of Southern Maine	Maine	7	A nutrition or public health school/department/college within a university
University of Maine Cooperative Extension	Maine	7	The Cooperative Extension Service of a Land-Grant University

Name of Implementing Agency	State	Region*	Type as per Response of Survey
Maryland Cooperative Extension	Maryland	6	The Cooperative Extension Service of a Land-Grant University
University of Massachusetts	Massachusetts	7	The Cooperative Extension Service of a Land-Grant University
Michigan State University Extension	Michigan	4	The Cooperative Extension Service of a Land-Grant University
Minnesota Chippewa Tribe	Minnesota	4	A Tribal Council or Tribal Health program
University of Minnesota College of Human Ecology	Minnesota	4	A department or college, other than public health, within a university
Alcorn State University	Mississippi	1	The Cooperative Extension Service of a Land-Grant University
Mississippi State University	Mississippi	1	The Cooperative Extension Service of a Land-Grant University
Missouri Department of Health and Senior Services, Bureau of Nutrition Policy and Education (Missouri Nutrition Network)	Missouri	3	A division of a State or territorial health department
University of Missouri-Columbia	Missouri	3	The Cooperative Extension Service of a Land-Grant University
Montana State University	Montana	3	The Cooperative Extension Service of a Land-Grant University
University of Nebraska	Nebraska	3	The Cooperative Extension Service of a Land-Grant University
Department of Nutrition, University of Nevada, Reno	Nevada	2	A nutrition or public health school/department/college within a university
University of Nevada Cooperative Extension	Nevada	2	The Cooperative Extension Service of a Land-Grant University
UNH Cooperative Extension	New Hampshire	7	The Cooperative Extension Service of a Land-Grant University
Rutgers, The State University of New Jersey	New Jersey	6	The Cooperative Extension Service of a Land-Grant University
New Mexico State University, Cooperative Extension Service	New Mexico	5	The Cooperative Extension Service of a Land-Grant University
Cornell Cooperative Extension	New York	7	The Cooperative Extension Service of a Land-Grant University
NY Department of Health	New York	7	A division of a State or territorial health department
Forsyth County Health Department	North Carolina	1	A local public health department
Macon County Public Health Center	North Carolina	1	A local public health department
North Carolina A&T State University	North Carolina	1	The Cooperative Extension Service of a Land-Grant University
North Carolina Cooperative Extension - NC Nutrition Network	North Carolina	1	The Cooperative Extension Service of a Land-Grant University
North Carolina Cooperative Extension - Partners in Wellness	North Carolina	1	The Cooperative Extension Service of a Land-Grant University
North Carolina Division of Aging	North Carolina	1	A State Department of Aging or Elderly Services
North Dakota State University Extension Service	North Dakota	3	The Cooperative Extension Service of a Land-Grant University
Ohio State University Extension	Ohio	4	The Cooperative Extension Service of a Land-Grant University
Chickasaw Nation	Oklahoma	5	A Tribal Council or Tribal Health program
Oklahoma State University Cooperative Extension Service	Oklahoma	5	The Cooperative Extension Service of a Land-Grant University
University of Oklahoma-Department of Nutrition Sciences in the College of Allied Health	Oklahoma	5	A nutrition or public health school/department/college within a university
Oregon State University, Extension Family and Community Development	Oregon	2	The Cooperative Extension Service of a Land-Grant University

Name of Implementing Agency	State	Region*	Type as per Response of Survey
Pennsylvania Nutrition Education Program	Pennsylvania	6	A department or college, other than public health, within a university
University of Rhode Island	Rhode Island	7	A nutrition or public health school/department/college within a university
Clemson University	South Carolina	1	The Cooperative Extension Service of a Land-Grant University
South Carolina Department of Health and Environmental Control, Office of Public Health Nutrition	South Carolina	1	A division of a State or territorial health department
South Dakota State University Cooperative Extension Service	South Dakota	3	The Cooperative Extension Service of a Land-Grant University
Tennessee State University, Nutrition Education Program (NEP)	Tennessee	1	The Cooperative Extension Service of a Land-Grant University
University of Tennessee, Agricultural Extension Service Tennessee Nutrition & Consumer Education Program (TNCEP)	Tennessee	1	The Cooperative Extension Service of a Land-Grant University
Corpus Christi Food Bank	Texas	5	An emergency food provider, such as a food bank or pantry
Houston Food Bank	Texas	5	Other
San Antonio Food Bank	Texas	5	An emergency food provider, such as a food bank or pantry
South Plains Food Bank	Texas	5	An emergency food provider, such as a food bank or pantry
Tarrant Area Food Bank	Texas	5	An emergency food provider, such as a food bank or pantry
Texas A&M Cooperative Extension	Texas	5	The Cooperative Extension Service of a Land-Grant University
Utah State University	Utah	3	The Cooperative Extension Service of a Land-Grant University
Bennington Rutland Opportunity Council (BROC)	Vermont	7	An emergency food provider, such as a food bank or pantry
Central Vermont Community Action Council (CVCAC)	Vermont	7	An emergency food provider, such as a food bank or pantry
Champlain Valley Office of Economic Opportunity (CVOEO)	Vermont	7	Other
University of Vermont	Vermont	7	The Cooperative Extension Service of a Land-Grant University
Vermont Campaign to End Childhood Hunger	Vermont	7	Other
Virginia Polytechnic Institute and State University	Virginia	6	The Cooperative Extension Service of a Land-Grant University
Department of Social and Health Services, Aging and Disability Services Administration	Washington	2	A State Department of Aging or Elderly Services
Washington State Department of Health	Washington	2	A division of a State or territorial health department
Washington State University	Washington	2	The Cooperative Extension Service of a Land-Grant University
West Virginia University	West Virginia	6	The Cooperative Extension Service of a Land-Grant University
Great Lakes Inter-Tribal Council	Wisconsin	4	A Tribal Council or Tribal Health program
Ho-Chunk Nation	Wisconsin	4	A Tribal Council or Tribal Health program
University of Wisconsin-Extension	Wisconsin	4	The Cooperative Extension Service of a Land-Grant University
University of Wyoming	Wyoming	3	The Cooperative Extension Service of a Land-Grant University

Source: *Implementing Agency Survey*

*Regional Codes: 1, Southeast; 2, Western; 3, Mt. Plains; 4, Midwest; 5, Southwest; 6, Mid-Atlantic; 7, Northeast.

Exhibit A3-5. Nutrition Network Characteristics

Network Characteristics	Percent of Implementing Agencies with a Nutrition Network
The nutrition education network is organizationally located within implementing agency structure, and the network activities are a part of a larger FSNE program	67%
Implementing Agency is solely a nutrition education network. Activities of the network are conducted independently of any other FSNE conducted in the State	19
Other	15
Number of Respondents: 27	

Source: Implementing Agency Survey

Exhibit A3-6. Nutrition Network Members

Type of Memberships	Percent of Implementing Agencies
State Government Organizations	
State Agency	81%
State Health Department – WIC program	67
State Health Department – Chronic disease section	33
State Health Department – Other	33
CES at a State land-grant university	89
Other State-funded university or college	52
State Department of Education	56
State Department of Aging or Adult Services	52
State Department of Agriculture	30
Other State agency	15
No State government organizations were members of the network*	7
Number of Respondents: 26	
Local Health and Social Service Providers	
Local FSO(s)	46%
Local public health department(s) or district(s)	62
Community action agency(ies)	38
Emergency food providers, such as food banks and/or soup kitchens	73
Local TANF or welfare office(s)	15
Local school district(s)	54
Faith-based social service provider(s)	42
Local hospital(s)	23
Local WIC agency(ies)	35
Private university or college(s)	15
Other	15
No local health or social service providers were members of the network	8
Number of Respondents: 26	

Type of Memberships	Percent of Implementing Agencies
Statewide Nonprofit Organizations	
American Cancer Society	17%
American Heart Association	22
State or local dietetic association	30
March of Dimes	0
5 A Day program	17
Other	39
No nonprofit organizations were members of the network	30
Number of Respondents: 23	
Industry or Associations	
Dairy council	60%
Fruit and/or vegetable trade association	24
Infant formula company	4
Meat industry trade association	32
Cereal manufacturers	8
Other	24
No industry or trade associations were members of the network	28
Number of Respondents: 25	
Advocacy Organizations	
State WIC association	30%
Food Stamps outreach or client advocacy organization	30
Welfare rights organization	0
Health care advocacy organization	4
Education advocacy organization	13
Disability rights organization	0
Other	22
No advocacy organizations were members of the network	39
Number of Respondents: 23	

Source: *Implementing Agency Survey*

Note: 33 percent of implementing agencies reported using a Nutrition Network

Note: One or more responses were given by each respondent.

Exhibit A3-7. Organizations or Agencies Members of the Outside Advisory Committee

Organizations	Percent of IAs
State Cooperative Extension Service	73%
State and/or local health department	69
State WIC Agency	58
State Department of Education	50
Agency on Aging or Bureau of the Elderly	46
Emergency food provider(s) (e.g., food banks, soup kitchens, food pantries)	46
Local food stamp office(s)	42
Local school district(s)	42
Nonprofit health-related organization(s) (e.g., American Cancer Society, American Heart Association)	38
Other university/academic center (other than Cooperative Extension Service)	35
TANF or Welfare Agency	35
Food industry (e.g., Dairy Council, Egg Commission)	27
Food distribution organization(s)	27
Faith-based service provider(s)	23
Hospital(s) (public or private)	0
Other	35
Number of Respondents: 26	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Exhibit A3-8. Quality of Coordination by Type of Implementing Agency

Implementing Agency Type	Formal or "Well-Coordinated" USDA Partnerships N
The CES of a land-grant university	46
A division of a State or Territorial health department	8
A nutrition or public health school/department/college within a university	6
An emergency food provider, such as a food bank or pantry	7
A Tribal council or Tribal health program	4
A department or college, other than public health and CES, within a university	4
A local public health department	3
Other	3
Number of respondents: 81	

Source: *Implementing Agency Survey*

Exhibit A3-9. Percent of Implementing Agencies—by Type—That Are Moderately or Well-Coordinated with USDA Initiatives

Implementing Agency Type	USDA Initiatives with Whom Implementing Agencies Coordinate, Either "Moderately" or "Well"						
	WIC	NSLP	SBP	Team Nutrition	Summer Food Service Program	Child & Adult Care Food Program	EFNEP
	Percent						
CES of a Land-grant University (<i>n</i> = 46)	67%	35%	20%	24%	41%	15%	72%
A Division of a State or Territorial Health Department (<i>n</i> = 8)	63	25	0	38	25	13	38
A Nutrition or Public Health School/Department/College (<i>n</i> = 6)	33	50	50	50	33	0	67
Other Department or College (<i>n</i> = 4)	50	50	25	50	25	50	50
A State Department of Aging or Elderly Services (<i>n</i> = 2)	0	0	0	0	0	0	0
An Emergency Food Provider (<i>n</i> = 7)	29	0	0	0	29	0	43
A Local Health Department (<i>n</i> = 3)	33	33	33	33	0	33	0
A Tribal Council or Tribal Health Program (<i>n</i> = 4)	100	0	0	25	25	25	25

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

CHAPTER IV ADDITIONAL EXHIBITS

Exhibit A4-1. Organizational Levels Where Most Key FSNE Planning and Implementation Decisions Were Made for FY 2004

	Percent of IAs
Jointly between the implementing agency and local projects and/or subcontractors	35%
At the implementing agency level exclusively	23
Jointly between the implementing agency, local projects and/or subcontractors, and regional offices	11
At different levels, depending on issue	15
Jointly between the implementing agency and its regional offices	3
Other	14
Number of Respondents: 80	

Source: Implementing Agency Survey

Exhibit A4-2. Local Project Involvement in FSNE Planning Process

Process	Percent of Local Projects/ Subcontractors Involved
Identify target audience	32%
Identify partners	31
Identify curriculum content, topics to teach	26
Identify funding sources	25
Identify goals and objectives	18
Use plan template provided by implementing agency and/or State agency	18
Update previous year(s) plans	16
Conduct needs assessment	10
Identify method of service delivery	10
Number of Respondents: 64 local projects	

Note: One or more responses were coded per respondent.

Source: Local Project Interview

Exhibit A4-3. Role of State Agency in Coordinating the Planning of FSNE Services Across Implementing Agencies

State Agency Role	Percent of SFSAs
State agency did not coordinate planning activities for any implementing agency	46%
State agency coordinated FSNE planning activities of ALL implementing agencies in the State	29
State agency coordinated planning FSNE activities of SOME but not all implementing agencies	21
Don't know	4
Number of Respondents: 24	

Source: State Agency Survey

Exhibit A4-4. Implementing Agency View of State Agency Effectiveness in Planning FSNE Goals, Objectives, and Activities for FY 2004

Rating	Percent of IAs
Effective	77%
Somewhat effective	18
Not effective	0
Don't know	6
Number of Respondents: 17	

Source: *Implementing Agency Interviews*

Exhibit A4-5. Types of Data the Implementing Agency Requested the State Agency to Provide in Order to Support the Needs Assessment or Selection of a Target Audience

Types of Data	Percent of IAs
Statewide FSP participation data	61%
County-level data on the number of FSP participants and/or participation rates	55
Data on the demographic characteristics of FSP participants	45
Information on the location of local FSP offices	35
Contact information (such as names and addresses) for FSP participants	27
Poverty data collected by the State food stamp agency for its own planning purposes	25
Data from evaluations conducted by the State food stamp agency	4
Other	10
No data requested	30
Number of Respondents: 84	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Exhibit A4-6. Role of State Agency Staff in FSNE Needs Assessment for FY 2004

State Agency Staff Role	Percent of SFSAs
Provided food stamp recipient participation and demographic data for specific counties or regions within the State	68%
Provided data on the location of local FSP offices	54
Provided implementing agency(ies) with statewide participation or demographic data on food stamp recipients	46
Provided information on the diversity of languages spoken among food stamp recipients	27
Actively involved in conducting needs assessment planning or formative research	16
Agency was not involved in any of these activities	14
Other	8
Number of Respondents: 37	

Note: One or more responses were given by each respondent.

Source: *State Agency Survey*

Exhibit A4-7. State Agency Policy on Priority of Serving Food Stamp Recipients and Applicants

State Agency Policy	Percent of SFSAs
Implementing agencies were asked to make food stamp recipients and applicants a high priority, but were allowed to serve other low-income populations as well	48%
Implementing agencies were asked to make food stamp recipients and applicants a high priority for FSNE, but were allowed to serve food stamp eligibles as well	24
Implementing agencies were encouraged to make food stamp recipients and applicants a priority, but were not restricted by our Agency as to the audience served	10
Implementing agencies were required to provide FSNE services only to food stamp recipients and applicants	2
Other	10
Our Agency did not provide any specific instructions or guidance to implementing agencies regarding serving food stamp recipients and applicants	6
Number of Respondents: 50	

Source: State Agency Survey

Exhibit A4-8. Percent of Implementing Agencies Conducting Message Testing

Message Testing	Percent of IAs
Some messages were tested	51%
No messages were tested	29
All messages were tested	20
Number of Respondents: 79	

Source: Implementing Agency Web-based Survey

Exhibit A4-9. Primary Reason(s) for Implementing Agencies Denying Funding to Local Projects

Reason	Percent of IAs
Unable to provide qualifying non-Federal contributions	62%
Choice of target audience that was inconsistent with implementing agency priorities	46
Did not develop sufficient planning document	46
Proposed staff were insufficient with respect to time available or qualifications	15
Proposed services would have duplicated other proposed or existing activities	8
Other	23
Number of Respondents: 13	

Note: One or more responses were given by each respondent.

Source: Implementing Agency Survey

Exhibit A4-10. Plan Implementation as Intended

	Percent of IAs
Plan was mostly implemented as intended	64%
Plan was fully implemented as intended	24
Plan was partly implemented as intended	5
Plan was not at all implemented as intended	7
Number of Respondents: 75	

Source: *Implementing Agency Survey*

Exhibit A4-11. Reasons for Not Implementing the FSNE Plan as Intended

Reason	Percent of IAs
General staffing shortages and/or an inability to hire qualified staff	62%
Shortfall of non-Federal contributions requiring adjustments in the number and type of FSNE activities	29
Problems with local projects and/or subcontractors	28
High staff turnover rate/constantly changing staff	26
Lack of cooperation from key partners	21
Change in needs of the selected target audience requiring a revised approach	16
FSNE client recruitment efforts fell short of expectations	12
Lack of bilingual staff	11
Higher than expected cost of implementing certain FSNE components	5
Other	18
Number of Respondents: 57	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

CHAPTER V ADDITIONAL EXHIBITS

Exhibit A5-1. Primary Goals of Local Project/Subcontractor

Primary FSNE Goals	Percent of Local Projects
Fruit/vegetable consumption	62
Dietary quality	52
Food safety	34
Physical activity	28
Food resource management	18
Number of Respondents: 65	

Note: One or more responses were given by each respondent

Source: Local Project Interview

Exhibit A5-2. Percent of Counties in a State Served by Implementing Agencies

Percent of Counties Served by Implementing Agencies	Percent of Implementing Agencies
75-100%	45%
50-74.99%	14
25-49.99%	12
0-24.99%	29
Number of Respondents: 84	

Source: Implementing Agency Survey

Exhibit A5-3. Change in Geographic Coverage of FSNE Provided by the Implementing Agency in FY2003 and FY 2004

Geographic Coverage Change	Percent of Implementing Agencies
No change in overall geographic coverage of FSNE	58%
Increased overall geographic coverage of FSNE	32
Reduced overall geographic coverage of FSNE	10
Number of Respondents: 81	

Source: Implementing Agency Survey

Exhibit A5-4. FSNE Activities that Are Coordinated Among Implementing Agencies and USDA-Funded Initiatives

USDA Initiative	Coordinated Component										Number of Respondents (n)
	Needs Assessment	Plan Development	Message Development	Message Delivery	Program Monitoring	Program Evaluation	Budget Development	Referral of Client	Information and/or Data Sharing	Other	
EFNEP	69%	69%	71%	86%	69%	65%	43%	65%	90%	8%	49
SBP	53	40	40	53	27	27	13	33	40	0	15
Child and Adult Care Food Program	50	43	36	86	29	29	14	50	50	0	14
NSLP	44	28	36	64	16	20	8	24	72	4	25
Team Nutrition	43	38	48	67	10	14	5	29	48	10	21
WIC	40	33	42	79	23	15	6	65	65	2	48
Summer Food Service Program	25	43	29	71	25	25	11	54	54	4	28

Note: One or more responses were given by each respondent. EFNEP (Expanded Food and Nutrition Education Program); SBP (School Breakfast Program);

NSLP (National School Lunch Program)

Source: Implementing Agency Survey

Exhibit A5-5. Implementing Agency Reported Coordination with Other Types of Organizations

Organization/Agency	Percent with Formal Contract or Agreement in FY 2004
State WIC Agency	58%
State Department of Education	45
Other university/academic center	39
State or local health department	35
Local school district	35
State Cooperative Extension Service	32
Emergency food provider (e.g., food banks, soup kitchens, food pantries, etc.)	23
Agency on aging	16
TANF or welfare agency	10
Nonprofit health-related organization (e.g., American Cancer Society, American Heart Association, etc.)	10
Hospital (public or private)	6
Food industry (e.g., Dairy Council, Egg Commission)	0
Other public organization, please describe	26
Other private organization, please describe	6
Number of Respondents: 31	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Exhibit A5-6. Role Played by State Food Stamp Agency in Social Marketing Campaign

Role Played by State Food Stamp Agency	Percent of Implementing Agencies
Provided information to facilitate reaching food stamp clients	73%
Consulted on message delivery or approach	73
Participated in message development	40
Participated in evaluation of social marketing campaign	33
Other	7
Number of Respondents: 15	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Exhibit A5-7. Additional FNS Curricula Used

Curricula	Percent of Implementing Agencies
Power of Choice: Helping Youth Make Healthy Eating and Fitness Decisions – U.S. Department of Agriculture, Food and Nutrition Service, Team Nutrition	39%
Changing the Scene: Improving the School Nutrition Environment – U.S. Department of Agriculture, Food and Nutrition Service, Team Nutrition	27
YourSELF Middle School Nutrition Education Kit – U.S. Department of Agriculture, Food and Nutrition Service, Team Nutrition	19
Number of Respondents: 74	

Source: Implementing Agency Survey

Exhibit A5-8. Number of Curricula Used

Number of Curricula	Percent of Implementing Agencies
Used 1 Curriculum	10%
Used 2-3 Curricula	15
Used 4-5 Curricula	22
Used 6-7 Curricula	25
Used 8-9	15
Used 10-11 Curricula	8
Used 12 or More	5
Number of Respondents: 74	

Source: Implementing Agency Survey

Exhibit A5-9. Languages Used in Materials or Activities in Addition to English

Language	Percent of Implementing Agencies
Spanish	90%
Vietnamese	13
Hmong	10
Cambodian	8
Russian	8
Chinese	7
Arabic	3
Thai	3
French	2
Hindi	2
Korean	2
Portuguese	2
Other	26
Number of Respondents: 62	

Note: One or more responses were given by each respondent

Source: Implementing Agency Survey

Exhibit A5-10. FSNE as a Food Stamp Benefit

	Percent of State Agencies
State Agency views FSNE as a Food Stamp Program benefit	94%
State Agency promotes FSNE as a Food Stamp Program benefit	66
Number of Respondents: 50	

Note: One or more responses were given by each respondent.

Source: State Food Stamp Agency Survey

Exhibit A5-11. Implementing Agency View and Identification of FSNE as a Benefit of FSP

	Percent of Implementing Agencies
View FSNE as a benefit of FSP	88%
Identify FSNE as a benefit	78
Number of Respondents*: 77	

* Includes 'Don't know' responses

Note: One or more responses were given by each respondent.

Source: Implementing Agency Survey

Exhibit A5-12. Belief by State Agency that FSNE Participants see FSNE as a Food Stamp Program Benefit

	Percent of State Agencies
FSNE participants somewhat recognize FSNE as a FSP benefit	45%
FSNE participants have little recognition of FSNE as a FSP benefit	35
FSNE participants do not recognize FSNE as a FSP benefit	10
FSNE participants very much recognize FSNE as a FSP benefit	4
Don't know	6
Number of Respondents: 49	

Source: State Agency Survey

CHAPTER VI ADDITIONAL EXHIBITS

Exhibit A6-1. Highest Level of Formal Education for Staff Delivering FSNE

Education Level	Mean Percent
Bachelors degree (without RD)	29%
Masters degree or higher (without RD)	21
High school diploma or GED	20
RD with Bachelors degree or higher	19
Some college but no degree	10
Less than high school diploma	1
Number of Respondents: 72	

Note: RD = Registered dietitian

Source: *Implementing Agency Survey*

Exhibit A6-2. Staff Receiving Training

Staff Group	Percent of IAs
Current professional staff at implementing agency/ subcontractor/ or local project	86%
Current paraprofessional staff at the implementing agency/ subcontractor or local project	81
New professional level staff at implementing agency/ subcontractor/ or local project	75
Number of Respondents: 63	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Exhibit A6-3. Information Collected Regarding Participation in Direct Education Services

Type of Information	Percent of IAs
Counted number of different persons attending classes or participating in individual nutrition education sessions with educator	75%
Counted number of persons completing a FSNE course or series of lessons	61
Provided a duplicate count of persons attending classes or participating in individual nutrition education sessions with educator	43
Other	11
Not applicable (Used direct education but did not collect participation information)	1
Number of Respondents: 84	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Exhibit A6-4. Information Collected Regarding Participation in Indirect Education Services

Type of Information	Percent of IAs
Counted number of items distributed through various locations	73%
Counted number of different FSNE events	61
Counted number of persons to whom mailings were sent	46
Assessed participation at FSNE events	45
Counted number of different messages or number of times messages delivered	39
Assessed number of exposures to posters and/or placards	31
Other	11
Not applicable (Did not use indirect education)	8
No participant information was collected	0
Number of Respondents: 84	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Exhibit A6-5. Methods of Fiscal Reviews of Local Projects or Subcontractors

Method	Percent of IAs
Internal review/audit conducted by implementing agency	53%
Independent audit commissioned by implementing agency	10
Independent audit commissioned by local project or subcontractor	10
Other	19
None	31
Number of Respondents: 58	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Exhibit A6-6. Frequency of Invoices to State Food Stamp Agency for FSNE

Frequency	Percent of IAs
Bimonthly or quarterly	50%
Monthly	32
Twice a year	8
Once for entire year	6
Other	3
Did not submit invoices to the State food stamp agency	1
Number of Respondents: 78	

Source: *Implementing Agency Survey*

Exhibit A6-7. Financial Data Reported to State Food Stamp Agency

Type of Data	Percent of IAs
Total compensation (salaries and benefits)	81%
Travel expenses	81
Indirect costs incurred by implementing agency	73
Non-capital equipment and supplies expenses	69
Nutrition education materials expenses	62
Other services expenses	58
Dollar value of in-kind non-Federal contributions	45
Equipment and other capital expenses	43
Total non-labor costs	42
Building/space expenses	35
Maintenance expenses	26
Dollar value of cash non-Federal contributions	20
Total staff hours or number of full-time equivalents	19
Administrative expenses charged by other agencies under a central services cost allocation plan or other similar method	15
Narrative report as to how funds were used	13
Detail of staff hours or full-time equivalents by job title or qualifications	12
Unliquidated obligations	5
Other	5
Number of Respondents: 84	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Exhibit A6-8. Methods Used by State Agencies to Monitor Implementing Agency FSNE Spending

Monitoring Methods	Mean Percent
Review of invoices for reimbursement	92%
Review of other financial reports from the implementing agency	51
Meeting(s) with implementing agency to review expenditures	33
Other	18
Number of Respondents: 49	

Note: One or more responses were given by each respondent.

Source: *State Agency Survey*

Exhibit A6-9. Audits or Fiscal Reviews of Implementing Agency FSNE Spending Required by State Agencies

Type of Audits or Reviews Required	Percent of States
Internal audit by implementing agency	23%
Review/audit conducted by the State Agency	19
Independent audit commissioned by the State Agency	2
Other	31
None	44
Number of Respondents: 48	

Note: One or more responses were given by each respondent.

Source: State Agency Survey

Exhibit A6-10. Types of Data Collected by Local Projects on Participation and/or Reach of Message in FY 2004

Type of Data	Percent of Local Projects
Participation data	54%
Behavior change	46
Demographic data	35
Feedback on materials and/or activities used	18
Number of Respondents: 65	

Note: One or more responses were given by each respondent.

Source: Local Project Interviews

Exhibit A6-11. Extent of Implementing Agency Involvement in Evaluations at Local Level

Extent of Involvement	Percent of IAs
Implementing agency provided significant support and technical assistance to local projects and/or subcontractors	37%
Implementing agency conducted outcome evaluations	30
Implementing agency provided some support and technical assistance	22
Implementing agency did not provide any support or technical assistance	4
Other	7
Number of Respondents: 54 that were involved in local evaluations	

Note: One or more responses were given by each respondent.

Source: Implementing Agency Survey

Exhibit A6-12. Factors that Affected which FSNE Services to Be Evaluated in FY 2004

Factors	Percent of IAs
Availability of adequate staff resources	49%
Availability of funds for outcome evaluation	34
Voluntary on part of local projects/subcontractors	23
New initiatives introduced	16
New target audience included	7
Other	43
Number of Respondents: 74	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Survey*

Exhibit A6-13. Key Findings of Implementing Agency Evaluations (Outcome or Impact) Based on Self-Reported Data

	Percent of IAs
Key Findings of the Evaluation	
Positive behavior change	50%
Positive knowledge change	18
Unreliable data, i.e., inconclusive findings	18
Message delivery needs improvement	9
Positive attitude change	5
Successfully identified client needs and message gaps	5
Other	9
Number of Respondents: 22	
Use of the Evaluation Results	
Modify/improve quality and delivery of nutrition education	35%
Modify/improve FSNE-related policies & planning	30
Complete reports/disseminate findings	26
Improve program/performance goals	13
Help partner with other agencies/organizations	4
Unreliable data, i.e., inconclusive findings	4
Improve staff/partner training	4
Support ongoing/future funding	4
Don't know	4
Other	4
Number of Respondents: 23	

Note: One or more responses were given by each respondent.

Source: *Implementing Agency Interviews*

CHAPTER VII ADDITIONAL EXHIBITS

Exhibit A7-1. Average Implementing Agency FY 2004 FSNE Budget: Non-Federal, Federal, and Total

	Mean (Std)
Non-Federal	2,975,201 (11,073,181)
Federal	2,801,323 (9,762,474)
Total	5,776,524 (20,833,639)
Number of Respondents: 72	

Source: Implementing Agency Survey. Std=standard deviation.

Exhibit A7-2. Distribution of Implementing Agency FY 2004 FSNE Budgets: Non-Federal, Federal, and Total

	Percentiles				
	Minimum	25%	50% (Median)	75%	Maximum
Non-Federal	4,262	164,846	1,090,927	2,584,480	93,764,903
Federal	4,262	200,903	1,090,122	2,397,257	82,400,213
Total	8,524	322,371	2,181,049	4,862,949	176,165,116
Number of Respondents: 72					

Source: Implementing Agency Survey

Exhibit A7-3. FY 2004 FSP Participants, FSNE Outlays, and Outlays per Participant in Top 10 States for Total Outlays

State	FSP Participants in thousands	Non-Federal outlays in thousands	Federal outlays in thousands	Total outlays in thousands	Percent of National Total	Outlays per participant
California	1,859	32,542	32,542	65,084	22%	35.00
Pennsylvania	961	9,951	9,951	19,901	7%	20.71
New York	1,598	7,920	7,920	15,839	5%	9.91
Michigan	944	6,802	6,416	13,218	4%	14.01
Missouri	700	6,506	6,506	13,013	4%	18.60
Illinois	1,070	5,886	5,886	11,771	4%	11.01
Wisconsin	324	5,648	5,822	11,470	4%	35.40
Minnesota	247	5,978	5,334	11,311	4%	45.71
Alabama	498	5,020	5,020	10,041	3%	20.18
Arizona	530	4,850	4,850	9,700	3%	18.32
Total for top 10	8,731	91,103	90,247	181,348	62%	20.77
Number of Respondents 10						

Source: Food and Nutrition Service Administrative Data (outlays and FSP participant counts); 2004 Current Population Survey Annual Demographic Survey (estimated number of persons with income below 185% of Federal Poverty Level). Study universe included 50 States and District of Columbia. One State (Delaware) had no FSNE outlays in FY 2004.

Exhibit A7-4. Total Implementing Agency Outlays: Federal, Non-Federal and Sum of Federal and Non-Federal (in Dollars)

Funds	Mean	Std
Non-Federal funds	1,843,163	3,642,659
Federal funds	1,766,830	3,573,824
Federal & Non-Federal funds	3,609,993	7,213,853
Number of Respondents: 72		

Source: Implementing Agency Survey. Std=standard deviation.

Exhibit A7-5. Total Implementing Agency Outlays: Federal, Non-Federal and Sum of Federal and Non-Federal (in Dollars)

Funds	Percentile				
	Minimum	25%	(Median) 50%	75%	Maximum
Non-Federal funds	4,262	135,064	867,476	1,995,090	27,633,838
Federal funds	4,262	171,455	821,243	1,995,090	27,633,838
Federal & Non-Federal funds	8,524	298,286	1,688,719	3,990,179	55,267,676
Number of Respondents: 72					

Source: Implementing Agency Survey

Exhibit A7-6. Average and Distribution of Adjusted Total Implementing Agency Outlays (Includes Federal Outlays and Non-Federal Outlays Up to Amount of Federal Outlays)

Statistic	Value
Minimum	8,524
25 th Percentile	298,286
Median	1,642,486
75 th Percentile	3,990,179
Maximum	55,267,676
Average	3,522,678
Standard deviation	7,148,886
Number of Respondents: 72	

Source: Implementing Agency Survey

Exhibit A7-7. Average Percent of FY 2004 Implementing Agency FSNE Budget Spent: Non-Federal, Federal, and Total

Source of Funds	Mean (Std)
Non-Federal	85 (20.2)
Federal	82 (18.4)
Total	84 (19.0)
Number of Respondents: 72	

Source: Implementing Agency Survey. Std=standard deviation.

Appendix B

Methodological Appendix

APPENDIX B

FOOD STAMP NUTRITION EDUCATION SYSTEMS REVIEW: METHODOLOGICAL APPENDIX

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Introduction

This appendix describes the methodological approach used for the Food Stamp Nutrition Education (FSNE) System Review, elaborating on the overview provided in Chapter II of the Final Report.

Key Components of Data Collection

The data collection for the FSNE System Review consisted of the following components:

- A baseline data abstraction from States' FSNE plan documents for FY 2004;
- A national web-based survey of FSNE representatives from all State agencies;
- A national web-based survey of representatives of all FSNE implementing agencies;
- On-site interviews with representatives of a sample of State agencies, implementing agencies, local projects, implementing agency and local project partners, and nutrition educators; and
- Collection of data from FNS on State FSNE budgets and spending over the past several years.

These data sources and the procedures used to collect the data from each of these sources are described in this appendix.

Abstraction of States' FSNE Plans for FY 2004

In late 2003 to early 2004, FNS' Regional Offices submitted copies of State plans to FNS as they were approved. Using a data abstraction form (Attachment A), the study team staff abstracted information from each approved State plan regarding each implementing agency. The data abstracted included: the type of organization sponsoring FSNE, the planned budget, number of full time equivalents (FTEs), number of local projects, planned number of participants, geographic distribution of services, and the nature of planned services. Information from the plan abstraction was structured into a State profile, listing number and type of implementing agencies, final approved budget amounts, geographic coverage, and other information descriptive of the States' FSNE. The final database included data for 93 FSNE-operating organizations that were identified as meeting the study's definition of implementing agencies.

The abstracted data were used in two ways. First, the data were used to identify implementing agencies for the site visit sampling. Second, project staff used the abstracted data to familiarize themselves with the characteristics of the sampled agencies before the recruiting process began, as did data collectors before conducting any site visits. In addition, data from the plan abstraction were incorporated into the State agency web-based survey for verification by survey respondents.

Instrument Development

The project staff developed and tested a set of survey instruments for the web-based survey of State agencies and implementing agencies and a set of interview protocols to be used in on-site data collection.

Web-Based Survey Instruments

Two web-based surveys were conducted for this study. In order to gain a full picture of the nutrition education provided to recipients of the Food Stamp Program (FSP) nationally, the web-based survey included all State agencies and implementing agencies administering FSNE in FY 2004. In States with multiple implementing agencies, all implementing agencies were surveyed.

Both web-based surveys focused on relatively specific and closed-ended questions designed to provide categorical data to describe FSNE operations and standard quantitative data on FSNE funding and costs. The surveys were designed to collect information that went beyond what was routinely provided in State plans and the final reports of FSNE activity, including details about program activities and costs not typically reported to FNS for FY 2004.

The State Agency Survey addressed FSNE organizational structure in each State and the States' perspectives on FSNE plan development and financial management. The Implementing Agency Survey addressed: organizational structure and decision-making process, partnerships and coordination, the FSNE plan development and approval process, needs assessment and target audience, nutrition education message and curricula, service delivery methods, service monitoring and evaluation, staffing, budget, and outlays. (Copies of the survey instruments are included in the FSNE System Review Database Documentation.)

We used the surveys to capture data from each of the following sets of stakeholders:

- The State FSP staff person with responsibility for coordination of the single State plan describing FSNE activities and costs,
- Staff from the implementing agencies responsible for the administration of the FSNE plan, and
- Persons involved in the budget development and financial accountability process, from both the State agency and implementing agency.

Questions developed for the web-based surveys were based on the study's research questions and were formatted in several different configurations. The question formats included:

1. Questions with multiple-choice answers where only one answer is appropriate.
2. Questions with multiple-choice answers that may have more than one appropriate response.
3. Verification tables where information from the FSNE plans was pre-entered, and respondents were asked to verify the accuracy of the information.
4. Repeat questions for multiple implementing agencies: The State agency web-based survey contained a series of questions related to the relationship between the State agency and implementing agencies. The initial question asked if the State had more than one implementing agency. If the State agency official checked "yes," then the questions were asked of the two largest implementing agencies, with size measured in terms of the implementing agencies' approved FSNE budgets in FY 2004. Follow-up questions to the State agency asked if the response would differ for any other implementing agencies in the State and, if so, how.

Skip patterns were developed to assure that respondents were directed to proper sections. For example, an implementing agency with no local projects (a direct provider or an agency performing a coordination function only) did not see questions related to local programs.

Because FSNE is administered by many different types of organizations, we anticipated that terms used in the survey questions might not have the same meaning to all respondents. To ensure consistency in survey response, we developed a list of definitions for the survey, in consultation with FNS staff, that was included in the programming of the online survey. A respondent could click on the “help” icon and go to the definitions page and read all the definitions prior to beginning the survey. The respondent could also see on each page of the survey, at the first mention of words included in the key words definitions list, the words highlighted in blue, underlined, and a popup window displaying the definition.

The web-based surveys were designed so that respondents could complete part of the survey, check their records or research answers to questions if they were not sure, and then complete the survey at a later time. This also allowed multiple, authorized respondents (e.g., the FSNE project director and a fiscal officer) access to the survey. An agency-specific username and password were required each time the survey was accessed. No persons other than those selected to receive usernames and passwords could access the website. The survey included worksheets that could be printed, completed by hand, and then entered at the respondent’s convenience.

The web-based surveys included no tracking of respondents’ Internet use. The surveys used session cookies (as opposed to persistent cookies) to allow the user to navigate among the pages of the survey without having to re-connect with the server on every page. These session cookies had a designated session timeout of approximately 30 minutes, at which point they expired if the individual remained inactive. Otherwise, a session cookie expired upon the browser closing and/or the user exiting the survey.

Upon entry into the website, the user was told that session cookies would be in use, but that no persistent cookies were contained in the website. Appropriate privacy assurance was provided. The session cookies were consistent with OMB guidelines for use of cookies in federally sponsored websites. No end-user browser information was tracked, nor did the cookies remain on the end-user hard drive. Upon completion of the surveys by all parties, the website was dismantled.

On-Site Data Collection Instruments

Project staff conducted open-ended, in-depth interviews with FSNE coordinators and budget officers at the State agencies and implementing agencies, key staff involved in FSNE services at the State- and local-level partner organizations, local project staff, and nutrition educators. Multiple “State-level” staff were interviewed, along with multiple staff at local projects. Because coordination with other nutrition education efforts directed at low-income families is so important to FNS, the project team interviewed a sample of public and private partners, State FSP officials, directors of other FNS-sponsored nutrition education programs (such as WIC or Team Nutrition), and selected directors of nutrition education projects funded by the U.S. Department of Health and Human Services (HHS) or the Centers for Disease Control and Prevention (CDC) where they had a relationship with the implementing agency’s or local project’s FSNE activities.

These interviews were conducted to understand better the dynamics of FSNE: why FSNE operates as described in the web-based surveys, how participating agencies plan, implement and manage the program, how they interact with program partners, and how basic program features vary within an implementing agency. Included in the site visits was an examination of how implementing agencies communicate priorities and program instructions to the local projects, the extent to which local projects have flexibility in creating their own programs, the costs associated with local delivery of FSNE, and the relationship between local FSNE providers and other nutrition education providers. In addition, the site visits provided the opportunity to examine documentation of FSNE staffing, costs and funding to obtain detailed information that cannot be reliably obtained without face-to-face dialogue.

Six instruments were developed for use during the on-site data collection:

- Interview Guide for State Agency
- Interview Guide for FSNE Implementing Agency
- Interview Guide for Implementing Agency Partner
- Interview Guide for Local Project or Subcontractor
- Interview Guide for Local Project/Subcontractor Partner
- Interview with Nutrition Educators at Local Agencies

Copies of the interview instruments are included in the FSNE System Review Database Documentation.

Testing Web-Based Surveys and Site Visit Interview Protocols

Both web-based survey instruments and the six interview guides were pilot tested during the summer of 2004. FSNE staff in three States (Connecticut, Maryland, and Washington State) that were not selected for the site visit sample were asked to complete paper versions of the web-based survey and participate in interviews with project team members.

During the on-site portion of the pilot test, the test respondents were interviewed after they had completed the survey to find out if all questions were clear, and to determine if any questions and/or their response categories needed to be altered. The study team also collected data on:

- How long it took respondents to complete the surveys and interviews,
- Whether each question was clear, relevant, and understandable to the respondents,
- Whether the structure and flow of the instruments were appropriate for the data collection process,
- Whether all of the questions could be answered in a manner consistent with the data collection needs of this study, and
- Whether any questions that needed to be asked were missing.

The pilot test provided valuable data and respondent feedback that informed further revision and refinement of the study instruments. A memo containing detailed description of the pilot test methods,

procedures, and findings was submitted to FNS. Some of the key findings from the pilot test are summarized below:

- Length of response time. The time required for the web-based surveys was similar in all test sites and within our time estimates. Similarly, most of the interview guides were completed within a reasonable amount of time. However, the implementing agency interview guide required much longer time than anticipated. The project team identified several strategies to shorten this instrument without sacrificing the content coverage. These strategies were implemented in subsequent revisions of all instruments.
- Structure and organization of the instruments. The overall organization of the web-based survey was effective. However, the pilot test identified potential problems with the skip patterns in the survey as well as ways to reorganize questions to avoid these problems.
- Organization of key concepts and topics. Several important content organization changes were prompted by the pilot test results, including: better integrating the financial and programmatic questions in the planning section; varying presentation of questions depending on the number of implementing agencies that a State has (single or multiple).
- Refining terms used in the instruments. The pilot test identified terms that were interpreted differently by different groups of respondents. The project team developed user-friendly methods of showing common definitions to survey respondents as well as plans to stress definitions of certain terms in interview data collector training.

All study instruments were revised extensively incorporating the findings and experiences from the pilot tests. After the paper-based versions of the instruments were revised, the computer-based versions of the surveys were developed and tested by the study team. After the internal testing process was completed, the two web-based surveys were pilot tested by FSNE staff in the same three States that had tested the paper-based surveys to ensure that they were without bugs and that the conversion from paper to web-based format did not cause any loss of meaning. This testing was conducted in January 2005.

Data Collection Instrument Clearance

As part of the survey instrument development, FNS published an announcement in the *Federal Register* (April 27, 2004, Volume 69, Number 81, pp. 22758-22759) describing the purpose and the need for this study. The announcement specified a 60-day period for receiving public comments. *The Federal Register* announcement generated comments from two State health departments expressing concerns that: the proposed study was of limited use given USDA's other, similar initiatives underway; the study would duplicate data already provided to FNS through FSNE plans and reports; and the level of respondent burden estimates published in the announcement might be incorrect.

After the draft survey and interview instruments were developed, refined, and tested, FNS prepared a request for the OMB review of the instruments. The request package submitted to OMB in November 2004 included responses to the three issues raised in the public comments to the *Federal Register* announcement. The OMB granted approval of the FSNE System Review study plan and instruments in March 2005.

Sampling Implementing Agencies and Local Projects for Site Visits

The project's review of State FSNE plans for FY 2004 identified 93 implementing agencies. A sample of these implementing agencies was selected for on-site data collection. This section describes the sampling process, identifies the implementing agencies that were sampled, and describes how local projects were selected.

Classification of Implementing Agencies

For purposes of this study, an implementing agency was defined as a organization that (1) had an agreement or contract with the State agency (or is the State agency) for the provision of FSNE services; (2) had a separate set of goals, objectives, and outcomes describing how FSNE would be conducted by the agency, and (3) had a separate budget that was approved by the State agency. Implementing agencies could be direct providers of FSNE; they could deliver services through local programs or could use a combination of both approaches. The review of State nutrition education plans identified three main types of organizations that entered into contracts with a State agency to provide FSNE services: Cooperative Extension Services (CES), nutrition networks, and "other" organizations. Other organizations included State agencies other than the State food stamp agency (e.g., a State health department), universities, and food banks.

Based on the State plan review, a classification system with five categories of implementing agencies was developed. As described in Chapter II of the Final Report, the five categories were as follows:

- (1) Cooperative Extension without Network
- (2) Cooperative Extension with Network
- (3) Independent Nutrition Network
- (4) Other Independent Providers without Local Projects
- (5) Other Independent Providers with Local Projects

Exhibit B-1 shows the five types of implementing agencies defined for this study, and the number of each type identified during the review of State FSNE plans.

Exhibit B-1. Number of Implementing Agencies, by Type, and States Represented in Each Category

Type of Implementing Agency	Number of IAs	States with the Type of Implementing Agencies in FY 2004
Cooperative extension without network	39	Alaska, Arkansas, California, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Louisiana, Maine, Maryland, Massachusetts, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Dakota, Ohio, Oklahoma, Oregon, Rhode Island, Tennessee, Texas, Utah, Virginia, Washington, West Virginia, Wyoming
Cooperative extension with network	10	Alabama, Colorado, Kansas, Michigan, Minnesota, New Jersey, North Carolina, Pennsylvania, South Dakota, Wisconsin
Independent nutrition network	8	Arizona, California, Iowa, Maine, Missouri, Oklahoma, Tennessee, Washington
Other independent provider without local projects	22	Connecticut, Kentucky, Mississippi, New York, North Carolina, Oklahoma, Texas, US Virgin Islands
Other independent provider with local projects	14	District of Columbia, Georgia, Illinois, Minnesota, Nevada, New York, North Carolina, South Carolina, Vermont, Washington, Wisconsin
Total	93	

Note: The classification of implementing agencies (IAs) into the five categories was based on the review of State FY 2004 plans. In the site visits, we learned one agency visited had been mis-classified.

Stratification

In order to capture the diversity of FSNE nationally, it was important to use a sampling plan that ensured selection of the appropriate number of implementing agencies from each of the five categories. We stratified the population of implementing agencies by type (the five categories) and FNS region. This stratification scheme ensured that the sample exhibited diversity of both implementing agency organizational structure and geography. With five implementing agency types and seven FNS regions, however, the number of stratification cells was 35, and not all implementing agency types were represented in each region.²⁶ For this reason we used a **systematic random sample** in which implementing agencies were first stratified according to type. All implementing agencies within a type were then sorted by FNS region, and within region they were sorted by size of budget (by ascending and descending order in alternate regions).²⁷ A sampling interval was computed from the number of implementing agencies in the type stratum and the number to be sampled, and a random starting point was selected. Implementing agencies corresponding to the random starting point and every *n*th implementing agency thereafter (where *n* was equal to the sampling interval, not necessarily an integer) were selected.

Sampling Rates and Intervals

We had the option of sampling implementing agencies of the five types with equal or unequal probability. We sampled with unequal probability for two reasons. First, FNS was interested in capturing as much diversity in FSNE operations as possible within a fixed resource budget. Second, we believed that there was likely to be less diversity in FSNE operations in some implementing agency types than others. For

²⁶ For example, in FY 2004, the Western Region did not include any implementing agencies in the "Cooperative Extension with Network" or "Other Independent Provider without Local Projects" categories. The Mountain Plains Region did not include any implementing agencies in the "Other Independent Provider without Local Projects" or "Other Independent Provider with Local Projects" categories.

²⁷ Sorting by size of budget in this approach helped ensure that the sample exhibited diversity in budget size as well as region and type.

instance, we expected that, as a group, FSNE operations in “Cooperative Extension without Network” implementing agencies would show less diversity than operations within “Cooperative Extension with Network” or “Independent Nutrition Network” implementing agencies. Thus, to maximize the diversity of FSNE operations in our total sample of implementing agencies, we chose lower sampling rates in strata expected to exhibit less diversity. Exhibit B-2 shows the selected sampling rates.

Exhibit B-2. Summary of Sampling Plan for Implementing Agencies

	Cooperative Extension without Network	Cooperative Extension with Network	Independent Nutrition Network	Other Independent Provider without Local Projects	Other Independent Provider with Local Projects	Total ^a
Number	39	10	8	22	14	93
Sampling rate	.30	.60	.60	.15	.60	.37
Number of sampled agencies	12	6	5	3	8	34

^a The total sampling rate of 0.37 is calculated as the ratio of sampled agencies to total agencies, 34/93.

With an overall sampling rate of 0.37, or 37 percent, the above plan **oversampled** implementing agencies in the “Cooperative Extension with Network,” “Independent Nutrition Network” and “Other Independent Provider with Local Projects” types, whereas it **undersampled** implementing agencies in the remaining types. Finally, because one implementing agency dwarfs all remaining implementing agencies in terms of budget, we sampled the California Department of Health Services (an “Independent Nutrition Network” agency) with certainty. It had a FY 2004 total FSNE budget of \$177 million, compared to a budget of \$28 million for the next largest implementing agency. The sampling rate for the remaining implementing agencies in this category was adjusted downward so that four implementing agencies were selected from the remaining seven.

Sample Selection

With the proposed stratification and sampling rates, we selected 34 implementing agencies in our sample. These implementing agencies are shown in Exhibit B-3, where the codes for Type of Agency are: 1 = Cooperative Extension without Network, 2 = Cooperative Extension with Network, 3 = Independent Nutrition Network, 4 = Other Independent Provider without Local Projects, and 5 = Other Independent Provider with Local Projects.

Exhibit B-3. Sampled Implementing Agencies (Reflecting Data Abstracted from FY 2004 State Plans)

Name of Implementing Agency	Type of Agency ^a	State	Region	Total FY 2004 Project Budget
Arizona Department of Health Services	3	Arizona	Western	\$13,628,586
Family and Consumer Sciences, CES , University of Arkansas	1	Arkansas	Southwest	4,535,360
California Department of Health Services	3	California	Western	177,271,526
Colorado State University	2	Colorado	Mountain Plains	6,293,554
District of Columbia Department of Health	5	District of Columbia	Mid-Atlantic	1,000,000
University of Florida	1	Florida	Southeast	6,573,282
University of Georgia Older Adults	5	Georgia	Southeast	715,794
University of Hawaii, College of Tropical Agriculture and Human Resources, CES	1	Hawaii	Western	320,000
University of Idaho Extension Nutrition Program	1	Idaho	Western	1,559,038
University of Illinois at Chicago, Division of Community Health	5	Illinois	Midwest	3,135,855
Iowa Nutrition Network; Iowa Department of Public Health	3	Iowa	Mountain Plains	3,040,018
University of Massachusetts	1	Massachusetts	Northeast	4,988,628
Michigan State University Extension	2	Michigan	Midwest	n/a
University of Minnesota College of Human Ecology	2	Minnesota	Midwest	13,102,018
Minnesota Chippewa Tribe	5	Minnesota	Midwest	n/a
Mississippi Department of Human Services	4	Mississippi	Southeast	49,686
Alcorn State University	1	Mississippi	Southeast	1,315,765
Montana State University	1	Montana	Mountain Plains	1,191,736
Department of Nutrition, University of Nevada, Reno	5	Nevada	Western	322,334
UNH Cooperative Extension	1	New Hampshire	Northeast	1,558,729
Rutgers, The State University of New Jersey	2	New Jersey	Mid-Atlantic	5,227,310
NY Department of Health	5	New York	Northeast	1,155,160
North Carolina A and T State University	5	North Carolina	Southeast	272,310
North Carolina CES	2	North Carolina	Southeast	5,263,073
Ohio State University Extension	1	Ohio	Midwest	5,168,918
University of Oklahoma-Department of Nutrition Sciences in the College of Allied Health	3	Oklahoma	Southwest	119,518
Oklahoma State University CES	1	Oklahoma	Southwest	2,140,648
South Dakota State University CES; South Dakota Department of Social Services	2	South Dakota	Mountain Plains	756,966
University of Tennessee Health Science Center	3	Tennessee	Southeast	1,087,175
South Plains Food Bank	4	Texas	Southwest	28,794
Permian Basin Food Bank	4	Texas	Southwest	189,954
West Virginia Department of Health and Human Services (through West Virginia University)	1	West Virginia	Mid-Atlantic	2,304,783
Ho-Chunk Nation	5	Wisconsin	Midwest	n/a
University of Wyoming	1	Wyoming	Mountain Plains	2,902,211

^a Type of agency:

- 1 = Cooperative Extension without Network
- 2 = Cooperative Extension with Network
- 3 = Independent Nutrition Network
- 4 = Other Independent Provider without Local Projects
- 5 = Other Independent Provider with Local Projects

n/a = not available through the FY 2004 State Plan abstraction.

Exhibit B-4 shows the States that were represented in the sample of 34 implementing agencies, grouped by type of agency and FNS region.²⁸

Exhibit B-4. State Agencies Selected for the Site Visit Sample, Based on Implementing Agencies Selected, by Type of Implementing Agency and FNS Region*

FNS Region	Cooperative Extension without Network	Cooperative Extension with Network	Independent Nutrition Network	Other Independent Provider without Local Projects	Other Independent Provider with Local Projects	Total
Northeast	MA, NH				NY	3
Mid-Atlantic	WV	NJ			DC	3
Southeast	FL, MS	NC	TN*	MS	GA, NC	5
Midwest	OH	MI, MN			IL, MN, WI	5
Mountain Plains	MT, WY	CO, SD	IA			5
Southwest	AR, OK		OK	TX, TX		3
Western	HI, ID		AZ, CA		NV	5
Total*	12	6	5	3	8	29

* The implementing agency and the State agency in Tennessee were dropped from the sample after the site visit data collection began. This reduced the final State agency sample to 28, of which 27 completed the interview.

Sampling Local Projects for Site Visits

Local projects were purposively selected to reflect the diversity of nutrition education efforts being carried out at the local level. The most important dimension of diversity varied, depending on the type of implementing agency and other features of the FSNE plan. For traditional CES agencies, we expected that the most diversity was in whether the local project served an urban, rural, or mixed area. Other relevant dimensions included method of delivery (e.g., direct education, indirect education, and social marketing), demographics of the target audience, and FSNE goals and objectives. The final selection of local projects also took into account the availability of staff and logistical efficiencies for the site visit itinerary.

Prior to the recruiting effort, senior project staff reviewed the abstracted data from each sampled implementing agency and prepared a list of three to seven local projects that exhibited diversity in nutrition education efforts. When the study team recruited an implementing agency into the study, the study team member discussed with the implementing agency staff about which local projects to visit. Selecting, in general, two to four local projects per implementing agency allowed us to capture as much diversity in FSNE operations within that agency, while staying within the constraints of the study resources. However, for some implementing agencies more than four local projects were visited because

²⁸ One modification was made to this sample design late in the site visit data collection period due to unforeseen developments. We discovered that the sampled implementing agency in Tennessee had been defunded early in FY 2004 and no one who had been associated with the implementing agency could be contacted for an interview. Thus, a decision was made to drop this implementing agency, and thereby the Tennessee State agency from the site visit sample. However, also late in the site visit period, it was decided to add another implementing agency in New York, to better reflect the State's relatively large FSNE budget. Thus, the final site visit sample retained 34 implementing agencies, but dropped the number of State agencies to 28.

of their diversity. The sampled implementing agencies in Texas had no local projects in their FSNE service organization.

Exhibit B-5 presents a summary of agencies visited in each sampled State for the on-site data collection.

Sampling Partner Organizations for Site Visits

Implementing Agency Partners

For each sampled implementing agency, the project team used data from the State plan data abstraction to determine the program partner for interview. The principal criterion for selection of the program partner was the nature and extent of involvement by the partner in FSNE services as described in the State plan.

Local Project Partners

We contacted local projects directly when we recruited them into the study and scheduled their site visits. At that time we ascertained whether they had any partnering agencies for provision of FSNE and, if so, who those partnering agencies were. If there was only one partnering agency, we sought to include an interview with that agency's representative during the site visit. If the local project had more than one partnering agency, we selected one for an interview based on the level of involvement of the partner in providing FSNE, as reported by the local project.

Web-Based Survey Data Collection

Access to the Website was controlled by a unique password assigned to each State agency and implementing agency. Notification about the survey and the instructions for participating in the survey was sent to all State agencies and implementing agencies using the following steps:

1. FNS notified all State agencies and implementing agencies through the regional offices that the study was being conducted and to inform them that they would be contacted by the Abt/HSR team regarding the survey. (See the notification letter at Attachment B.) An e-mail and/or phone call was then sent from HSR to all State agencies and implementing agencies with instructions on accessing the web-based surveys and the schedule for the surveys to be completed. The FNS letter instructed agency staff to direct questions to appropriate study team staff.
2. The study team monitored the responses to surveys, sent out reminders, and responded to questions. The web-based survey contained a "contact us" feature that allowed the respondent to access the e-mail address of the survey director, or to phone the survey team staff via an 800 phone line to ask questions.
3. Respondents were able to save their responses to survey questions at any time using the "save this document" feature. Once the survey was complete, however, we asked the respondent to click on the "survey complete" feature, which locked out all further access to the survey. The completed survey form was then be moved to the database, where it was reviewed by HSR survey staff for completeness. If there were questions regarding the completeness or accuracy of survey responses, a staff person contacted the respondent and resolved the data issues.

The status of survey completion was updated daily. Weekly conference calls were held within the project team to assess the response rate and to determine if any additional steps were necessary to obtain the target response rate.

Exhibit B-5. Number of Days and Interviews Completed in Each State for On-Site Data Collection

State	Number of Days	State Agency	Implement-ing Agencies	State-level Partners	Local Projects	Local Partners	Nutrition Educators
Arizona	5	1	1	3	7	2	2
Arkansas	3	1	1		3	3	
California	7	1	1	1	5		
Colorado	3	1	1	1	2	3	
District of Columbia	1	0 ^a	1		0 ^a		
Florida	3	1	1		2	3	1
Georgia	5	1	1	1	0 ^b	3	
Hawaii	3	1	1	3	0 ^c		
Idaho	3	1	1	1	3	2	2
Illinois	3	1	1		1	1	2
Iowa	5	1	1	6	6	3	
Massachusetts	3	1	1		3	3	3
Michigan	3	1	1	1	4	1	3
Minnesota	5	1	2	1	4	2	2
Mississippi	3	1	1 ^d		0 ^d	3	3
Montana	3	1	1		3	2	3
Nevada	3	1	1		0 ^e		
New Hampshire	3	1	1	1	3	2	
New Jersey	5	1	1	1	5		1
New York	5	1	2		2		3
North Carolina	5	1	1 ^f		3		
Ohio	3	1	1	1	2	2	2
Oklahoma	5	1	1 ^g	1	1	1	2
South Dakota	3	1	1		2	1	
Texas	3	1	2		0 ^h		
West Virginia	3	1	1	1	3	3	
Wisconsin	3	1	1	1	0 ⁱ		1
Wyoming	3	1	1	1	3	3	2
TOTAL		27	31	24	67	43	32

Note: In many sites, nutrition educators who played a key role in their local project nutrition education activities were interviewed together with local project staff, using the local project interview protocol.

^a The State agency staff was not available for interviews. The local projects were schools where staff were not available for interviews during the summer break when the site visit was scheduled.

^b The University of Georgia, College of Nutrition and Consumer Sciences, Department of Foods and Nutrition, used centrally-based faculty and graduate students in nutrition to deliver nutrition education classes at senior centers. There were local partners but no local offices or subcontractors who functioned as local projects. The implementing agency director and nutrition educator interview were combined, because the only nutrition educator currently on staff was also a member of the implementing agency central staff.

^c The sampled implementing agency used no local project or subcontractor for FSNE.

^d One of the two implementing agencies sampled in Mississippi, the Mississippi Department of Human Services (MDHS), was misclassified as an implementing agency. Instead, a representative from MDHS was interviewed as a local project partner. The second implementing agency had no local projects.

^e Three local projects that had been selected in Nevada were school districts and staff were not available for interviews during the summer break when the site visits were scheduled.

^f Two implementing agencies were sampled in North Carolina, but only one site visit was conducted. Due to the contracting system in North Carolina there appeared to be multiple implementing agencies, but in fact there was only one, the North Carolina CES.

^g Two implementing agencies were sampled in Oklahoma, but only one site visit was conducted. The sampled University of Oklahoma implementing agency is also a partner agency to the Cooperative Extension and was therefore interviewed as an implementing agency partner. They provided no direct nutrition education.

^h The selected implementing agencies in Texas had no local projects.

ⁱ Three local projects contacted for site visits in Wisconsin were schools where staff were not available for interviews during the summer break when the site visit was scheduled.

When the time to complete the web-based survey collection approached, we sent these agencies a reminder letter. Repeated reminder emails and telephone calls were made to slow responders during April through July 2005 on a bi-weekly schedule to reach the targeted response rates of 95 to 100 percent. The final response rates (of usable survey forms) were 96 percent for State agencies (50 out of 52 total) and 90 percent for implementing agencies (84 out of 93 total).

Recruitment of State Agencies and Implementing Agencies for On-Site Data Collection

Recruitment of Sampled State Agencies

A few days after FNS sent a notification letter to all State agencies and implementing agencies regarding the web-based survey, another letter was sent by the FNS project officer to the principal contact person in each sampled State, requesting their cooperation in participating in the site visit interviews (Attachment C). This letter requested State agency's cooperation in encouraging the sampled implementing agencies to participate in the site visits. Similar letters were subsequently sent to sampled implementing agency, local projects, and local partners asking them to participate in interviews.

Following the receipt of the advance letter, each respondent received a call from a member of the recruitment team to schedule the interview. The recruitment team leader answered any questions the State agency director had about the planned data collection, confirmed the State agency's willingness to participate in the on-site data collection activities, and collected contact information about who at the State agency would be most appropriate to respond to the in-depth interviews.

The respondent was asked to identify several possible upcoming dates and times for the visit. The recruitment team leader then sent a reminder letter to the agency contact, indicating the general topics to be discussed. Throughout this process, all efforts were made to accommodate the agencies' schedules, and the study participants were given a realistic appraisal of the amount of contributions in time, information, and human resources that would be expected.

Recruitment of Implementing Agencies

Recruiting of a State's sampled implementing agency(ies) started as soon as its State agency indicated its willingness to cooperate in the study. We e-mailed a recruitment letter to the FSNE director at the implementing agency describing the study, detailing the purpose of and plans for on-site data collection, and seeking the implementing agency's cooperation with our on-site interviews.

Shortly afterwards, a study member called the implementing agency's FSNE director to answer any questions about the study and seek their willingness to participate in the on-site interviews. Once agreement was reached, the study member discussed our tentative selection of local projects and partnering agencies for on-site data collection. We asked the FSNE director for contact information for the local projects (and partnering agencies, if available).

Recruitment of Local Projects and Partnering Agencies

Once an implementing agency was recruited into the study and confirmed the selection of local projects, we sent letters to the selected local projects. Again, the letter described the study, detailed plans for on-site data collection, explained that the State agency and implementing agency had agreed to participate in the study, and sought the local project's willingness to participate. If the FSNE director preferred to first contact the local project to let them know about the study, we waited a few days before sending letters and contacting the local project ourselves.

When we called the local projects we also asked about partnering agencies at the local level and to identify nutrition educators. If there were any partnering agencies, we selected one for an interview and asked the local project for contact information. We then sent a recruiting letter to the local partner and followed up with a phone call to confirm their willingness to participate and to schedule a time for the site visit. As with the implementing agencies, if the local project director wished to contact the partnering agency first, we provided time for that before sending the recruiting letter.

On-Site Data Collection

The on-site data collection was conducted during April through June of 2005. The site visits began one month after the implementation of the web-based surveys so that the site visit interviews could explore in greater detail the FSNE operational issues based on information obtained from the survey.

Site Visit Data Collector Training

Once the OMB approval was received, the project team began the training of data collectors. We conducted a 2.5-day training in early April 2005. Training materials were designed to ensure quality data collection, including appropriate protocols for contacting and working with implementing agencies. During the training, senior project staff provided background information on FSNE and reviewed the challenges encountered during a previous study of FSNE. The training prepared project staff to anticipate a variety of issues when conducting the on-site interviews.

Materials for the site visits consisted of briefing books for each sampled State with information about its implementing agencies based on data abstracted from the State plans and the State agency and implementing agency web-based surveys. Training materials were designed to accommodate the diversity of implementing agency approaches, and yet maintain consistency in data collection. The interviewers were instructed in the training regarding specific web-based survey data to extract and review for the States and implementing agencies that they were assigned to visit as part of the preparation for each site visit. The training included instructions for preparing site visit reports, with a general overview of how the qualitative data would be coded for data entry.

On-Site Data Collection Teams and Schedules

Our sample of implementing agencies (Exhibit B-5) included 24 instances in which only one implementing agency in a State had been sampled (in most cases, the selected implementing agency was the only implementing agency in the State). In five instances (Minnesota, Mississippi, North Carolina,

Oklahoma, Texas, and New York), two implementing agencies within a State were selected, yielding a total of 34 sampled. Generally, when only one implementing agency within a State was sampled, a two-person team spent three days on-site, for a total of six person-days of data collection. On the first day, both team members visited the implementing agency and jointly conducted the following interviews:

- Director of nutrition education: 4 hours
- Budget administrator: 2 hours

We did not visit any regional staff that may be organizationally located between the implementing agency and local projects. During the interview with the implementing agency, however, we ascertained whether such a regional structure existed and the roles they played in FSNE activities.

For the remaining two days of the site visit, the two-person team split up. One member went to the State capital to meet with the State agency administrator (1.25 hours), a budget director (.75 hours), and a representative of a partnering agency, such as the State WIC director (1 hour).²⁹ That person visited a local project on the third day of the trip. The second team member visited two local projects, generally over two days. Thus, our usual plan was to interview a total of three local projects affiliated with the sampled implementing agency. For all interviews conducted by one interviewer, data collectors asked permission to audio record the interview to facilitate preparation of the interview report.

The interview schedule at each local project was:

- Local project director: 2 hours
- Budget administrator: .75 hours
- Nutrition educators (If more than one, in a group interview): 1.33 hours
- Local partner (if applicable): 1 hour

An exception to the above data collection schedule was for California, where we selected the California Department of Health Services as the sampled implementing agency. Because of the size of this implementing agency in terms of both local projects (over 200), local partners (over 200) and budget (over \$177 million), the two-person team spent a full five days (ten person-days) on site. The additional four person-days were spent visiting four additional local projects and partnering agencies. Modified schedules were also implemented for visits to Minnesota, Mississippi, North Carolina, Oklahoma, Texas, and New York to accommodate data collection from two implementing agencies and their local projects and partners.

²⁹ Partnering agencies were sampled purposively, based on their importance to the implementing agency's plans and the need to have a diverse sample. If the sampled partnering agency could not be visited on the same day as the State agency, a team member visited the partnering agency on the day of a local project visit. If logistics did not permit an in-person interview, the partnering agency interview was conducted by telephone.

Site Visit Reports

After each site visit, data collectors prepared a report on each interview conducted, including responses to all interview questions. The interview reports followed a standardized format to facilitate coding and entry of the information into a qualitative database.

After the interview reports were written, blocks of text within the report were coded using a pre-established hierarchical structure. Data quality supervisors reviewed the coded interview reports to ensure consistency in coding. Once complete, the coded information contained in the reports was entered into the study's qualitative database by trained coders.

Final Survey and Interview Response Rates

The response rates for the web-based surveys were 96 percent for the State Agency Survey and 90 percent for the Implementing Agency Survey. For the on-site interviews, staff from all organizations we contacted for this component of data collection agreed to participate, except for a few cases that are noted below Exhibit B-5.³⁰ The number of respondents and response rates for all data collection activities are summarized in Exhibit B-6.

Exhibit B-6. Summary of Data Collected for FSNE System Review

Instrument			
Web-Based Surveys	Total Number Contacted	Number of Respondents	Response Rate
Survey of State Agencies	52 agencies	50 agencies	96%
Survey of Implementing Agencies	93 agencies	84 agencies	90
Interview Protocols	Total Number Contacted	Number of Interviews Completed	Response Rate
State food stamp agencies	28 agencies	27 ^a	96%
Implementing agencies	31 agencies	31	100 ^b
State-level partners	24 organizations	24	100
Local projects	76 organizations	67	88
Local partners	43 organizations	43	100
Nutrition educators	32 nutrition educators	32	100

^a No SFSA staff were available for the interviews in one sampled State.

^b Of the 31 implementing agencies that were contacted for implementing agency interviews, all responded. See explanations in Exhibit B-5 notes.

Except for the financial data, the level of missing data across survey questions was very low at 5 percent or less. For interview data, the item-level response rates varied greatly across instruments and items. For many questions, only about half of the respondents provided responses. These "low response rates" were due to the great diversity among organizations, staff, and services involved in FSNE. Many of the interview questions did not apply to many respondents. However, there were no cases of refusals to respond, except for the local agencies in Wisconsin that cancelled the scheduled site visit appointments.

³⁰ The only changes to the original site visit samples involved: 1) exclusion of one FY 2004 implementing agency in Tennessee that no longer existed in spring 2005, 2) exclusion of the Tennessee State agency, and 3) addition of a second implementing agency in New York.

Obtaining State-Level Data on FSNE Budgets and Spending

The web-based survey and the on-site data collection instruments were designed to collect more disaggregated fiscal data on FSNE operations and spending than those available from existing sources. However, as discussed in the final report, collecting complete, uniform fiscal data from all implementing agencies was not possible, largely due to different ways in which data were maintained and reported across different agencies. Thus, FNS provided the following State-level data:

- Approved FSNE budget based on approved, final State plans for FY 2004 (Source: Food Stamp Program); and
- Federal outlays and nonfederal outlays for FY 2004, as reported to FNS by States on the *SF-269 Financial Status Report*.

These data were used in the editing of the financial data from the surveys, and for the analysis of total and per-capita FSNE spending for all States.

Development of Project Databases

The data collected for this study were organized into two types of databases. A “quantitative” database was created from numerical and categorical data collected with the two web-based surveys. The interview data were organized and placed in “qualitative” analysis databases.

Quantitative Database

Data from the two web-based surveys were uploaded from the Internet into multiple SQL databases (one for State agencies and one for implementing agencies). We trained the data quality control (QC) staff on the web-based surveys and the data collected in these surveys. Prior to entry into the database, each survey was checked for completeness and consistency in response. If there were omissions or unclear responses, a QC team member phoned the respondent to resolve the data problem.

Cleaning the Financial Data in Surveys

The implementing agency survey requested detailed financial data that were not available from extant FNS databases and reports: a breakdown of the agency’s budget by source of funds, a breakdown of outlays by type of expenditure and source of funds, and a breakdown of outlays by type of agency providing funds. The survey provided instructions, enabled respondents to compile information on a hard-copy of the worksheet before entering the data, and listed a toll-free number to call with questions.

Despite these efforts to assure data quality, the initial analysis found that 40 of the 84 implementing agency surveys had problems with budget data, 39 had problems with outlays by type of expenditure, and 45 had problems with outlays by agency providing funds. Problems included completely missing responses, incomplete responses (e.g., missing totals or major items), internally inconsistent responses (items not summing to total), and inconsistencies between budget and outlays.

The budget and outlays data from the implementing agency survey were edited and revised according to the following basic rules:

1. Implementing agency totals could not exceed State totals for the available variables (from FNS): Federal budget, Federal outlays, and nonfederal outlays.
2. The Federal share of the implementing agency's budget and outlays could not exceed the nonfederal share, unless this was true in the State totals.
3. The Federal share of the implementing agency's outlays could not exceed the agency's Federal budget.
4. Questions involving nonfederal outlays should have matching totals.
5. Absent other valid information, nonfederal outlays were assumed to be equal to Federal outlays.

Based on these rules, 43 of 84 completed surveys were flagged as having problematic data on budgets, outlays, or both. Of these, 31 were edited by applying these rules, yielding 72 usable observations for analysis of total budgets, outlays, and percent of budget spent. Missing implementing agency budget data were filled from the State Agency survey and the State FSNE Plan abstractions. When the totals suggested the likelihood of an entry error in the detail of a question, the detail was reviewed and, if possible, corrected (e.g., obvious instances of decimal slip or double entry).

Readers are cautioned that the edited data for any individual implementing agency represent the most credible estimate with the available data, but actual audited costs may differ. Another limitation of the data is that the State-level outlays were provided by FNS in November 2005, when States still had 10 months to claim additional Federal reimbursement for FSP administrative outlays. Therefore, the State totals used to impute implementing agency outlays may understate the final totals, which will not be available until October 2006.

The financial data from California posed a special problem. The largest implementing agency reported \$82.8 million in nonfederal outlays. On the other hand, the State totals in the FNS data were \$32.5 million each in nonfederal and Federal outlays (as of November 2006), and the other implementing agency in California reported \$5.5 million in nonfederal outlays and \$4.9 million in Federal outlays. Thus, the FNS data implied that the largest implementing agency had \$27.6 million in Federal outlays, or \$55.2 million less than the survey figure. Therefore, if we had used the survey data and assumed an equal amount of Federal outlays, we would have increased the national totals of nonfederal and Federal FSNE outlays by \$55.2 million apiece, or 18 percent. Inspection of the FNS data revealed that the State had \$54 million in unliquidated obligations. Thus, it appeared that the implementing agency included unliquidated obligations in its reported outlays. This implementing agency did not report the amount of Federal outlays. In keeping with our general rule #1, we imputed the Federal outlays for this agency as equal to the State total less the total for other implementing agencies (i.e., \$27.6 million), and we imputed the nonfederal outlays as equal to the Federal outlays (rule #5). Thus, our estimates may understate the nonfederal outlays for this agency and, by extension, for FSNE as a whole, particularly if the State subsequently liquidated some of the \$54 million in unliquidated obligations. Review of past years' FNS data indicate a history of substantial unliquidated obligations for this State and several others.

Qualitative Database

The process for constructing the site visit database involved the coding of interview responses, using the Center for Disease Control's qualitative data analysis software— Analysis Software for Word-Based Records (AnSWR).³¹ This software allows for coordinating and conducting large-scale, multisite data analyses that integrate qualitative and quantitative techniques, developing a data codebook, and the systematic application of codes to textual data.

After the first round of site visits, data collectors wrote their interview reports. A subset of site visit data collectors served as coders for all of the interview reports. To ensure inter-rater reliability, we trained a small team of coders who were experienced field research staff.

Data from all interview forms were coded and organized into AnSWR data files as: 1) coded categorical data, and 2) narrative text data. The AnSWR program was used to compute frequencies and percentages of the coded interview data. However, the high levels of item-level “missing data” led us to focus primarily on descriptions of typical narrative information from the interviews to provide contextual, qualitative information to accompany the frequencies and percentages generated from the web-based survey data.

The method used to select the implementing agencies for site visits was designed to provide a sample that systematically captured the diversity across all implementing agencies based on type of organization, geographic distribution, and size of FY 2004 budget. Thus, for the implementing agency interview questions, the assumption was that we could weight the sample-based percentages and generate reasonable estimates of responses that would be obtained from the census of implementing agencies. However, in the analysis of the interview data, we discovered that there were substantial levels of “nonresponse” and “not apply” responses, which the site visitors attributed to the great diversity among responding organizations. Given the high rates of “missing data,” weighting of implementing agency interview data was not appropriate analytically. The samples of other organizational groups (e.g., the State agencies and local projects) were based on the implementing agency sample, not on a systematic random sample method. Thus, frequencies and percentages based on these interviews should not be interpreted as representing these organizational groups nationally.

Public Use Data Files

A set of electronic files has been constructed to permit FNS and its designees to further explore the data collected as part of the Food Stamp Nutrition Education Systems Review. Survey data collected from State agencies and implementing agencies are housed in SAS (Statistical Analysis Software) datasets. Because a great deal of cleaning and additional work was necessary to make the financial data captured through the surveys usable, separate files for these modified financial data were created.

Site visits conducted for this study required the use of six different interview protocols. Each interview protocol is associated with an AnSWR file in which each interview is a record. The narrative text data from the interviews were coded into response categories that were generated from the data. Databases with these binary codes have been exported from AnSWR into SAS. They can be merged with the survey

³¹ AnSWR can be downloaded from <http://www.cdc.gov/hiv/software/answr.htm>.

data by using the implementing agency identification number and/or State identifier. Exhibit B-7 lists the final public use datasets created from the data collected for this study.

Exhibit B-7. Public Use Datasets Containing FSNE System Review Data

Dataset Name	Type of Database	Number of Records
State Food Stamp Agency Survey (SFSA_survey.sas7bdat)	SAS	50
Implementing Agency Survey (IA_survey.sas7bdat)	SAS	84
State Food Stamp Agency Financial Data (State_clean.sas7bdat)	SAS	50
Implementing Agency Financial Data (ia_clean.sas7bdat)	SAS	84
State Food Stamp Agency Interview Coded Data (SFSA_codedtxt.sas7bdat)	SAS	27
Implementing Agency Interview Coded Data (IA_codedtxt.sas7bdat)	SAS	31
Implementing Agency Partner Interview Coded Data (IAP_codedtxt.sas7bdat)	SAS	24
Local Agency Interview Coded Data (LA_codedtxt.sas7bdat)	SAS	67
Local Agency Partner Interview Coded Data (LAP_codedtxt.sas7bdat)	SAS	43
Nutrition Educator Interview Coded Data (NE_codedtxt.sas7bdat)	SAS	32
State Food Stamp Agency Interview Textual Data (project3.mdb)	AnSWR	27
Implementing Agency Interview Textual Data (project3.mdb)	AnSWR	31
Implementing Agency Partner Interview Textual Data (project3.mdb)	AnSWR	23
Local Agency Interview Textual Data (project3.mdb)	AnSWR	67
Local Agency Partner Interview Textual Data (project3.mdb)	AnSWR	43
Nutrition Educator Interview Textual Data (project3.mdb)	AnSWR	32

Limitations of Study Data

Several issues related to the design of the study and/or the nature of FSNE may have affected the quality of survey and interview data with regard to the accuracy, completeness, reliability, and validity of data. The key issues are summarized below.

Self-Report Data. All data collected for this study were reported by staff in agencies and organizations providing FSNE services. Except for the budget and fiscal outlay data provided by FNS (which were also originally reported by FSNE agencies), none of the study data came from sources independent of FSNE agencies. There was no way to assess the extent of possible bias in the data provided by study respondents.

Response Rates. As mentioned earlier, the survey response rates were quite high – 96 percent for the State Agency Survey and 90 percent for the Implementing Agency Survey. At the individual item level, both web-based surveys had very low levels of missing data, except for the financial data sections. The problems with the financial data likely reflected a number of issues including variations in record-keeping systems, definitions of terms, and budget categories.

The item-level response rates for on-site interviews were lower largely due to the great diversity among FSNE organizations and staff resulting in many questions that were not applicable.

Definitions of Key Terms. In reviewing the survey responses and interviewing FSNE program staff, it became clear that respondents used varying definitions of several terms used in this study. Examples are: the meanings of “needs assessment” and “outcome and impact evaluations.” Varying definitions presented challenges even though we included easy access to an online glossary for the web-based surveys and the site visit data collectors were thoroughly trained to help the interview respondents understand the meaning of our questions.

Different Interpretations and Applicability of Questions Depending on Respondents. Some of the survey and interview questions were interpreted differently by respondents, which seemed to reflect the variations in FSNE organizational types and structures, contexts for FSNE program, and prior experience with FSNE. An example was: whether or not to consider non-Federal funds contributed from universities as “implementing agency funds” for implementing agencies that were part of a Cooperative Extension Service based in a State university. When asked to break out FTEs by type of staff (paraprofessional vs. professional) some FSNE staff responded in terms of job categories regardless of educational and professional backgrounds.

Variations in Program Record Keeping Systems. Implementing agencies varied greatly in how they organized and reported program operations and participant data, and some agencies’ data were not compatible with the way we intended to collect the data for this study. As we explain in more detail in Chapter VII, this problem became a major constraint in conducting financial analysis of FSNE operations.

Absence of Data Representing the FNS Perspective. In order to generate in-depth descriptions of the complex, multilayered FSNE structure and operations, this study was designed to focus all data collection efforts on the State and local stakeholders involved in FSNE administration and service delivery. No data were collected from FNS representatives such as Regional Office staff. For the aspects of FSNE operations that relate to interactions between FSNE agencies and FNS, the data reflect only the State agency and implementing agency perspectives.

ATTACHMENT A. DATA ABSTRACTION DOCUMENT – 2004 FSNE STATE PLANS

SECTION I: STATE DEMOGRAPHIC INFORMATION

1. State:
2. Number of Implementing Agencies:
3. Type of Implementing Agency:
 - ☐ A. Cooperative Extension, Traditional
 - ☐ B. Cooperative Extension, Network
 - ☐ C. Nutrition Network, Other
 - ☐ D. Other:
4. Name of Implementing Agency:
5. Address of Implementing Agency:
6. Contact person for this Abstraction:
7. Phone Number:
8. Fax Number:
9. E-mail Address:
10. Total Project Budget: \$
 - A. State Share: \$
 - B. Federal Share: \$
11. Total Number of FTEs:
 - A. State-level:
 - B. Local-level:
12. Total number of Counties and/or Local Programs Providing FSNE:

Counties:
Local Programs:
13. Waivers Approved

Exclusivity Waiver	YES	NO
Private Cash Donation Waiver	YES	NO
Other _____		

SECTION II: TARGET AUDIENCE

1. Number of Clients (or contacts) Anticipated to be Served:
2. Target Audience(s) Identified in Plan:
3. Has Implementing Agency Conducted a Needs Assessment? Yes No
If yes, what type of needs assessment?

- ☐ A. Review of Secondary Data
- ☐ B. Conduct original qualitative research
- ☐ C. Conduct original quantitative research
- ☐ D. Use needs assessment produced by other agency
- ☐ E. Other

4. Geographic distribution of Services:

Statewide: _____ Regional: _____

SECTION III GOALS, OBJECTIVES, AND METHODS

1. Categories of behavioral goals and objectives of 2004 nutrition education effort:

- ☐ A. Dietary Quality

SPECIFIC GOAL	OBJECTIVE

- ☐ B. Food Resource Management

SPECIFIC GOAL	OBJECTIVE

- ☐ C. Food Safety

SPECIFIC GOAL	OBJECTIVE

- ☐ D. Food Security

SPECIFIC GOAL	OBJECTIVE

_____ E. Other:

SPECIFIC GOAL	OBJECTIVE

2. Dietary guidelines to be addressed:

- _____ A. Healthy weight
- _____ B. Physical activity
- _____ C. Use pyramid guide for food choices
- _____ D. Choose a variety of fruits and vegetables
- _____ E. Food safety
- _____ F. Low fat and cholesterol
- _____ G. Moderate sugar intake
- _____ H. Use less salt
- _____ I. Alcohol in moderation
- _____ J. Choose a variety of whole grains

3. Methods to be used in reaching goals and objectives:

- _____ A. One-on-one nutrition education
- _____ B. Nutrition education classes to groups
- _____ C. Social marketing efforts
- _____ D. Other

4. What types of interventions have been designed to implement methods?

- _____ A. State-level Interventions
- _____ B. Local-level Intervention

5. Education Materials to be used:

- _____ A. Materials developed by project

Justification for Development

- _____ B. Materials developed by FNS
- _____ C. Materials developed by other State FSNE programs
- _____ D. Materials developed by other public nutrition education programs
- _____ E. Materials developed by private agencies
- _____ F. Other

SECTION IV. PROGRAM COORDINATION

1. List programs with which program coordination is planned:

- ☐ A. Team Nutrition or other school-based programs
- ☐ B. WIC
- ☐ C. 5-a-day
- ☐ D. Commodity food programs
- ☐ E. Head Start
- ☐ F. Food banks/pantries
- ☐ G. Other public health nutrition education programs
- ☐ H. Local Food Stamp Offices
- ☐ I. Other private nutrition education efforts (list)

2. Describe program coordination efforts:

Coordination Efforts	Description
A. Shared materials	
B. Common message development	
C. Services provide on other program site	
D. Program planning	
E. Joint funding of local projects	
F. Client Recruitment	
G. Joint Training	
H. Other	

3. Extent of coordination:

- ☐ A. State-level only
- ☐ B. Local-level only
- ☐ C. Both State and local level

SECTION V. PROGRAM EVALUATION

1. How are objectives to be measured?

Objectives	How Measured

2. Will the implementing agency be conducting any evaluation efforts?

If so, what type:

- ☐ A. Process evaluation efforts
- ☐ B. Outcome evaluation efforts

3. Anticipated use of evaluation results:

ATTACHMENT B. WEB-BASED SURVEY NOTIFICATION LETTER TO ALL STATE AGENCIES AND IMPLEMENTING AGENCIES

March 2005

Dear State Agency Director [FSNE Implementing Agency Director]:

The Food and Nutrition Service (FNS), U.S. Department of Agriculture, has contracted with Abt Associates Inc. and Health Systems Research, Inc. to conduct the *Food Stamp Nutrition Education Systems Review*. The purpose of this national study is to develop comprehensive, up-to-date description of food stamp nutrition education (FSNE) services and operations that will inform the Federal and State policy makers as well as local service providers in their efforts to enhance the FSNE program.

This study will involve two data collection activities: (1) web-based surveys of all State agency directors and FSNE Implementing Agency directors, and (2) site visits to a sample of implementing agencies, their State agencies, local projects, and FSNE partners to conduct in-depth interviews with selected FSNE staff. *The purpose of this letter is to introduce the web-based State Agency Survey [FSNE Implementing Agency Survey] to you and ask your cooperation in completing the survey.*

Topics Addressed in the Survey

The survey will focus on FSNE services provided during Federal Fiscal Year 2004 (FY 2004), which ran from October 1, 2003 through September 30, 2004, and address topics such as: organizational structure and decision-making process in FSNE agencies; partnerships and coordination of FSNE activities; FSNE plan development; needs assessment and identification of target audiences; FSNE message development and delivery methods; agencies' assessment of FSNE performance and outcomes; budgeting and financial management processes; and FSNE funding and expenses.

Use of Survey Data

This survey is not an audit or a management review. The information you provide will be used to develop a profile of FSNE program in each State and an integrated national description of FSNE implementing agency activities.

Voluntary Participation and Protection of Data Privacy

Your participation in the survey is completely voluntary. Failure to complete the survey will not affect your employment or your agency's receipt of Federal funds for FSNE in any way. However, your contribution to this study is of great importance. A high rate of participation by State agency and implementing agency directors is essential to providing a comprehensive picture of FSNE that cannot be obtained from State FSNE plans.

If you agree to participate, your agency's name and location, and your general job title (e.g., State FSNE director, budget director) will be identified in reports prepared for the study and in data files provided to FNS. However, none of your responses to the survey will be released in a form that identifies you or any other State FSP agency [implementing agency] staff member by name.

Convenient Survey Completion

You may access the web-based survey by logging into the Internet and following the steps indicated below:

Step One: Go to <http://www.hsrnet.net/xxxxxx>
Step Two: Click on the 'xxxxxxxxxxxxx' link on the left side of the page.
Step Three: Scroll to the bottom of that page and click on
 '**Click Here to begin the State Agency Survey for the FSNE
System Review.**'
Step Four: Enter User Name and Password (listed below). Please note they are
 both case-sensitive.

 username: **xxxxxx**
 password: **yyyyy**

The average total time to complete the State Agency Survey is 85 minutes [FSNE Implementing Agency Survey is 300 minutes], but it is designed so that you can respond at your convenience and over multiple sessions. In addition, you may not have all the information needed to respond to all questions immediately at hand. You may save and quit the survey at any time while you gather the necessary information. You also may ask other staff members to fill out sections of the survey for which they have the needed information.

We ask that you complete the survey by [DATE]. After you have completed the survey, the survey staff from the Health Systems Research, Inc. (HSR) may contact you to clarify your response to particular questions.

Contacts for Additional Information

For questions regarding specific survey questions and how to complete the survey: Contact Dr. Loren Bell of HSR at (207) 772-1410 or lbelle@hsrnet.com, or Ms. Jodi Anthony of HSR at 1-800-xxx-xxxx or janthony@hsrnet.com.

For questions regarding this research: Contact the study director, Dr. Fumiyo Tao, of Abt Associates Inc. at 301-634-1855 or fumiyo_tao@abtassoc.com.

For questions about your rights as a research subjects: Contact Ms. Marianne Beauregard at Abt Associates Inc. at 617-349-2852 or marianne_beauregard@abtassoc.com.
(Calls to all of the telephone numbers listed above, except the 1-800 technical assistance number, will be regular long-distance toll calls.)

We thank you in advance for your full cooperation in contributing to this important study.

Sincerely,

Fumiyo Tao
Project Director
Abt Associates Inc.

Kristen Dowling Hyatt
Project Officer
USDA Food and Nutrition Service

ATTACHMENT C. RECRUITMENT LETTER TO STATE AGENCIES SAMPLED FOR SITE VISITS

March 2005

Dear [State Agency Director]:

The Food and Nutrition Service (FNS) has selected Abt Associates Inc. and its subcontractor, Health Systems Research, to conduct a national study of food stamp nutrition education (FSNE) activities in Federal Fiscal Year (FY)2004. The goal of the study is to provide FNS with a comprehensive description of current FSNE activities and decision making at the State, implementing agency (subgrantee), and local project (sub-subgrantee) levels.

To meet this goal, the **Food Stamp Nutrition Education Systems Review** includes two surveys to be conducted in February 2005—one to be completed by all State agencies and another by all implementing agencies. Both surveys will be administered via the Internet. In addition, to learn more about FSNE decision-making processes at all levels, the Abt and HSR researchers will visit selected implementing agencies, their State agencies, and their local projects/subcontractors and partnering agencies in March-May 2005 to conduct in-person interviews with representatives of these agencies and organizations.

Your State agency and [sampled implementing agency name(s) in this State], have been selected for the in-person interview component of the study. The purpose of the interviews is to learn more about the roles of the State agency, the implementing agency, the local projects/subcontractors, and partnering agencies in FSNE planning, coordination, and supervision. Topics for the interviews include: agency organization and administration related to the provision of FSNE, development of the State's annual nutrition education plan, budgeting, needs assessment and identification of target audiences, message development, development and use of nutrition education materials, coordination of FSNE activities across implementing agencies, evaluation of nutrition education process and outcomes, staffing, supervision and monitoring activities, and sources and uses of funds.

We look forward to your Agency's participation in the in-depth interview component of the **Food Stamp Nutrition Education Systems Review**. We also request your assistance in strongly encouraging the implementing agencies in your State that have been selected for site visits to participate. During the site visit, we will need to meet with you and the State FSP budget official most knowledgeable about FSNE finances, either separately or jointly, for a total of approximately 2 hours. At each sampled implementing agency, we will interview the agency FSNE director and the budget official who is most familiar with FSNE budgeting and expenses. These interviews will take a total of approximately 6 hours.

I assure you that all these interviews are part of a research study and not an audit or management review of your Agency's or implementing agencies' FSNE activities. Information such as Agency name and location, and respondents' general job titles (e.g., FSNE director, budget director) will be identified in reports prepared for this study and in data files provided to FNS. However, no interview responses will be released in a form that identifies individual respondent by name. Completion of the surveys and participation in the interviews is completely voluntary. Failure to complete a study component will not affect respondents' employment or their agency's receipt of Federal funds for FSNE in any way.

A member of the study team will call you in a few days to answer any questions you may have about the study, to confirm your Agency's participation in the study, and to further describe our data collection plans. At that time we would also like to discuss possible dates for the on-site visit. We will need to coordinate interview dates among all the agencies, partners and local projects so that we may collect all the data in a single visit to [State].

The success of this important study depends on what we can learn about FSNE activities in [State], and we look forward to your cooperation. In the meantime, if you have any questions about the study, please feel free to call me at 703-305-2135. You may also contact me at kristen.hyatt@fns.usda.gov.

Sincerely,

Kristen Dowling Hyatt
Project Director
USDA Food and Nutrition Service



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